



Modern Slavery Policy

Prepared: 13th January 2021

Invictus Roofing Ltd,
Unit 6D Southbourne Business Park,
Courtlands Road,
Eastbourne,
East Sussex,
BN22 8UY

Company Number: 08988956





Modern slavery statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Invictus Roofing Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Invictus Roofing Ltd has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Invictus Roofing Ltd operates in the South East of England, operates in the Construction sector offering flat roofing services.

Our high-risk areas

Areas of our business considered to be high risk is the employ of subcontracted labour. This area of concern has been identified via training. Subcontractors must supply passports, nation insurance numbers and tax references if directly subcontracted by Invictus Roofing Ltd. If subcontracted through another company, all contractors must provide DBS checking.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.



Our suppliers

Invictus Roofing Ltd operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on-site audits which include a review of working conditions]. Our antislavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.



Sign Off Sheet

I have read and understood the contents of the Modern Slavery Policy.
Anything I did not understand has been explained to me, to my satisfaction.

I agree to follow the Modern Slavery Policy and understand that any instructions are
provided or my safety and the safety of others.

<u>Print Name</u>	<u>Signature</u>	<u>Date Of Signature</u>
JOSHUA LAMPRELL		13.01.2021
ADRIAN MITCHELL		13.01.2021
KAYLEIGH AMBRIDGE		13.01.2021
SOPHIE LARBY		13.01.2021

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