Modern Slavery & Human Trafficking Policy

The Purvis Group refers to a collection of construction and associated companies primarily based in Fife. This policy relates to all companies listed below which are part of this:
Robert Purvis Plant Hire Ltd; Realm Construction Ltd; Duncan-Pryde (Contractors) Ltd; Hatrick-Bruce Ltd, Eagle Recycling (UK) Ltd; Cartmore Building Supply Co. Ltd; Purvis Storage and Distribution Ltd; AM Howie Ltd, Recycle Fife Ltd and East Coast Drainage Services Ltd.

The Purvis Group recognises that slavery and human trafficking remains a global problem which transcends age, gender and ethnicities and it is our responsibility as an employer to educate staff on the risk this can bring to our business and our supply chain.
This statement and policy are made pursuant to the Modern Slavery Act 2015, specifically section 54, and as an organisation operating in Scotland we also apply the guidance as laid out in the Human Trafficking and Exploitation (Scotland) Act 2015.
The Purvis Group is a collection of mainly construction-based companies, each separate legal entities, none having a turnover of £36M or more, meaning we are not legally required to publish such as a statement but wish to demonstrate our awareness and being part of a larger supply chain we fully recognise our actions can have an impact. The following sets out the steps that Purvis Group 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. Our organisation 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 outsourced activities.

Our business and structure
Company activities range from groundworks, surfacing and multi-trades contracting to plant hire, waste recycling and building material supplies working in the housing, commercial and industrial sectors. We work with a number of other companies within our supply chain, both subcontractors and suppliers

In order to achieve this, it is our policy to:

- operate a robust recruitment policy, ensuring eligibility to work checks are carried out on all new employees and that each member of staff is issued with terms and conditions of employment and information on their statutory rights;
- continually review and audit our practices to ensure all employees are paid at least the minimum wage;
- ensure all staff within management and procurement roles are aware of this policy and provide suitable training so they understand the signs of modern slavery and human trafficking and how to report these.
- implement a whistle blowing policy so that all employees know they can raise concerns about how colleagues are being treated, or practices within the business or supply chain, without fear of reprisals;
- carry out more stringent vetting within our own supply chains and asking them to demonstrate they are aware of their own responsibilities and comply with our values;
- not knowingly support or deal with any business involved in slavery or human trafficking;
- have zero tolerance to slavery, human trafficking or forced labour.

Definitions

- Human Trafficking: the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.
- Forced Labour: all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.
- Harmful Child Labour: consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

Requirements for Suppliers:

To demonstrate the willingness to abolish modern slavery and human trafficking, the Purvis Group will not support or deal with any business knowingly involved in these acts and therefore only work with those who agree with this policy by confirming they:

- will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty;
- will ensure that the overall terms of employment are voluntary;
- will comply with the minimum age requirements prescribed by applicable laws
- will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements;
- will abide by applicable law concerning the maximum hours of daily labour;
- will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK; and
- will ensure that any sub-contractors or suppliers from whom they source goods and/or services for incorporation in those supplied to the Purvis Group, also adhere to these requirements.

Safeguards

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith any suspicion they might have. If an employee considers that they have suffered any such treatment, then they should inform the Company HR Department immediately or by following the Group Grievance Procedure which can be found within the Employee Handbook.

Performance Indicators

In order to demonstrate awareness and compliance we :

- require all key staff to have completed training on modern slavery annually
- implemented a system for supply chain verification whereby we evaluate potential suppliers before they enter the supply chain; and
- we periodically evaluate all existing suppliers and ask they declare any changes within their own policies and awareness of their requirements under the Act where it applies to them.

Training & Awareness

We require all key staff within the company to complete training on modern slavery as part of a wider human rights/ethics/ethical trade learning programme.

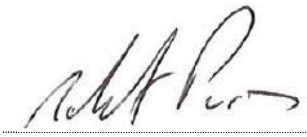
As well as training key staff, we raise awareness of modern slavery issues by distributing memos via our HR online system and issuing toolbox talks to the wider workforce. The memos help explain to staff the basic principles of the Modern Slavery Act 2015 and other applicable guidelines; how employers can identify and prevent slavery and human trafficking and what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation.

Breaches of this policy

Any employee found to be in breach of this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Any claims or allegations which are found to be malicious or vexatious will result in disciplinary action being taken against the individual. We may terminate our relationship with other individuals and organisations working on our behalf if they are found to be breach this policy.

This policy will be regularly monitored and formally reviewed annually, or following any significant event to which it relates, such as changes in working practices or legislation to ensure its continuing suitability. It will be communicated to all employees on induction and be displayed at all workplaces. Copies will also, upon request, be available to relevant interested parties, as appropriate.



Date of last review **13/01/26**

Date for next review **December 2026**

Robert Purvis (Chairman)