



Anti-slavery, corruption and ethical business policy

Pro Landscapes MDX Ltd
Unit 35 Longshot Lane Industrial Estate
Bracknell
Berkshire
RG12 1RL

Registered Company Number: 09207539

Policy date: January 2023

Pro Landscapes MDX are committed to ensuring fair business practices are adopted and maintained both internally and throughout its extended supply chain, including subcontractors.

The scope of this policy is to highlight business practices which constitute as unethical, and the roles and responsibilities of both Pro Landscapes MDX, its employees and its supply chain to ensure

Our main goals within our organisation and its supply chain are to:

- Ensure all relationships with suppliers and subcontractors are fair and honest
- Assess all potential suppliers to ensure they meet the standards of our safety, quality, environmental and ethical standards
- Exclusively utilise suppliers who work within best practice and all current legislation, such as the Modern Slavery Act 2015, Equality Act 2010 and Health and Safety at Work Act 1974.

This policy is to be reviewed annually, ensuring it is aligned or exceeds existing best practice and current legislation. This is to be undertaken by Directors Daniel Pilcher and Andrea Daykin in conjunction with company senior leadership.

Signed:



January 2022

Andrea Daykin
Director

Pro Landscapes MDX Ltd

This policy is due for review in January 2024.

Arrangements

1. Ethical business practices

Anti-slavery, human trafficking and child labour

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Living Wage

1.3 Pro Landscapes MDX are a living wage employer, paying all workers (excluding apprentices) the Real Living Wage or above, as defined by the Living Wage Foundation, of £9.30 p/h (or £10.75 p/h in London).

1.4 Pro Landscapes MDX has a preference for any supplier who can provide credible evidence that they pay the Real Living Wage.

1.5 Our supply chain only consists of suppliers who can demonstrate payment of the National Living Wage to all individuals over the age of 25 – for clarity, this equates to £8.21 p/h or higher (as of January 2020). Any suppliers who cannot demonstrate this are excluded from our supply chain.

Equal opportunities

1.7 Pro Landscapes MDX endeavours to provide equal opportunities to all of its workforce, regardless of gender, sexual orientation, race, religion or age. For further information, consult our equal opportunities policy.

1.8 We expect the same standards to be held by every member of our supply chain. Potential suppliers are required to demonstrate that they have both a valid equal opportunities policy and a review/audit system in place to ensure adherence.

Safe working conditions

1.9 Pro Landscapes MDX reviews its policies and procedures annually or following any changes to best practice to facilitate the safest possible working environment and conditions for its employees, the general public and other stakeholders, in accordance with all current legislation, such as the Health and Safety at Work Act 1974 and CDM 2015.

1.10 All suppliers are expected to demonstrate compliance with all legislation in terms of health, safety and wellbeing, through the provision of policies, procedures and

accreditations (if present), complemented by site audits to be undertaken by Managing Director Dan Pilcher.

Freedom of association

1.11 Employees of Pro Landscapes MDX are actively encouraged to associate with external groups such as trade unions and leave or join groups voluntarily. This is disseminated to all new starters during induction.

1.12 All suppliers are required to evidence appropriate measures to uphold freedom of association throughout their organisation and that no such issues have arisen as a result.

Corruption and bribery

1.13 Pro Landscapes MDX will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it conducts business, including, in the UK, the Bribery Act 2010 (the Act), which applies to conduct both in the UK and abroad.

1.14 A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence under the Act, namely giving or offering a bribe; receiving or requesting a bribe; or bribing a public official.

1.15 Pro Landscapes MDX may also be liable under the Act if it fails to prevent bribery by an associated person (including, but not limited to Workers) for the Firm's benefit

1.16 It is not acceptable for any worker or someone on their behalf to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or the Firm will improperly be given a business advantage, or as a reward for a business advantage already improperly given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure;
- accept payment from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage;
- accept a gift or hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by the Firm in return;
- threaten or retaliate against another Worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

1.17 Training on this policy is provided for all Workers and our zero-tolerance approach to bribery and corruption will, where appropriate, be communicated to clients, suppliers, contractors and business partners

This policy applies to **all persons** working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Any third-party or supplier found to be in breach in any of the above, or who fails to demonstrate such practices upon request are to be removed from or rejected from our organisation or approved supply chain.

2. Responsibility for the policy

2.1 The directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 Daniel Pilcher has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to your manager.

3. Compliance with the policy

3.1 You must ensure that you read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager, or the directors.

3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the staff handbook.

4. Communication and awareness of this policy

4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

4.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. Breaches of this policy

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.