

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Introduction

O. Heap & Son (Derby) Limited trading as OHEAP Fire & Security ('The Company') is committed to the highest level of ethical standards and transparency within our business in our approach to tackling modern slavery. We support the government's objective to eradicate modern slavery and human trafficking. We will actively consider how we can contribute to this objective and will take all reasonable steps to do so. We will not knowingly support or deal with any business involved in modern slavery. The Company is committed to preventing modern slavery and human trafficking in our business activities, and to ensuring that our supply chains are free from slavery and human trafficking. This policy sets out our approach to preventing modern slavery and human trafficking.

The Company's annual turnover (2023: £20,626,239) falls below the threshold defined in the Modern Slavery Act 2015 and as such we are not required to publish an annual Modern Slavery statement.

The Company is engaged in the supply of Fire Protection, Security and Safety products and services solely within the United Kingdom. We currently have approximately 140 direct employees; our supply chain includes several hundred product suppliers and dozens of specialist contractors. The Company does not utilise any labour suppliers or agency employees. Neither do we directly import any products or raw materials into the UK.

Policy Aims

This policy sets out the Company's position in respect of any form of modern slavery and human trafficking and provides guidelines aimed at:

- Ensuring (as far as practicable) compliance with modern slavery legislation in our business activities and our supply chains
- Enabling employees, contractors, suppliers, and other business partners working for or on behalf of the Company to understand the modern slavery risks and to encourage them to be vigilant and effectively recognise, prevent, and report any concerns of modern slavery taking place
- Providing information on the policies and procedures available to identify modern slavery risks and prevent human trafficking.

Policy Statement

Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including forced or 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.

The Company has a zero-tolerance approach to modern slavery of any kind within our operations. 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 business.

This policy applies to all employees, contractors, suppliers, and any other business partners working for or on behalf of the Company in any capacity.

We will aim to ensure that our Suppliers are confirming they act ethically and within the law in their use of labour, considering the number of suppliers that we use and their organisations' size in comparison to ours.

Where possible, we build long standing relationships with local suppliers and make clear our expectations of business behaviour.

Risk Assessment

The risk of modern slavery occurring within the organisation and its direct supply chain is assessed as low.

All Company employees have a contract of employment and checks are undertaken during the recruitment process to ensure that they are freely and willingly entering into that contract. The Company does not hold any employees' original personal documents, although copies will be retained on file for legitimate business purposes.

All our suppliers and subcontractors are UK entities. We do not directly contract with any organisations outside the UK. While we recognise that those suppliers may have supply chains that extend worldwide, we do not have the resources to carry out checking or auditing of the modern slavery practices within their supply chains.

Similarly, we are unable to measure and report upon performance other than verifying that our own employment practices are constantly checked and verified by the Compliance Manager during the employee onboarding process, and that all suppliers are required to confirm that they will abide by the requirements of the Modern Slavery Act 2015.

Responsibilities and reporting procedure

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all employees, contractors, suppliers, and any other business partners working for or on behalf of the Company in any capacity.

Department Managers are responsible for compliance in their respective departments, including any subcontractors in use by them.

The Purchasing and Process Manager is responsible for ensuring that our suppliers are acting in accordance with this policy.

Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

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

Employees must notify their Line Manager, other appropriate Manager, or the Compliance department as soon as possible if they believe or suspect that a breach of this policy has occurred, or may occur in the future, in accordance with the Company's Whistleblowing Policy.

If Employees are unsure about whether a particular act, treatment of workers more generally, or their working conditions within our supply chain constitutes any of the various forms of modern slavery, they should raise it with their Line Manager, other appropriate Manager, or the Compliance department.

We are committed to ensuring that 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 business or supply chain.

Training

Training on this policy is provided to all employees at induction and the policy is available through the Employee Handbook. All suppliers and subcontractors are required to confirm that they will abide by the policy.

Definitions

Modern Slavery:

- forced to work – through coercion, or mental or physical threat;
- owned or controlled by an 'employer,' through mental or physical abuse or the threat of abuse;
- dehumanised, treated as a commodity, or bought and sold as 'property;'
- physically constrained or have restrictions placed on their freedom of movement.

Forced or Compulsory Labour involves any work or services which people are forced to do against their will under the threat of some form of punishment.

Human Trafficking involves transporting, recruiting, or harbouring people for the purpose of exploitation, using violence, threats, or coercion.

Implementing and reviewing the Policy

Overall responsibility for policy implementation and review rests with the Managing Director. The policy will be reviewed periodically. The Company will inform all employees of the policy and any amendments to the policy. The latest version of this policy will be available to access on the website.



Nicholas Heap, Managing Director

1 May 2025