



Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out the actions of LARS Communications Limited to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the telecommunications industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of LARS Communications Limited:

- LARS Communications Limited is a company offering civil engineering, installation and commissioning of aerials and rigging to support clients in the telecommunications industry.

Countries of operation and supply

The organisation currently operates in the following countries:

- UK, Northern Europe

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Ian Turner, Managing Director
- **Risk assessments:** Ian Turner, Managing Director
- **Investigations/due diligence:** Ian Turner, Managing Director

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the



Modern Slavery and Human Trafficking Statement

supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form.

- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment policy** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.



Modern Slavery and Human Trafficking Statement

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- developing a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains, whereby the organisation evaluates all existing suppliers.

Training

The organisation requires supply chain managers and HR professionals within the organisation to complete training on modern slavery within the organisation's ethical trade training programme.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by circulating a series of emails to staff.

The emails explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;



Modern Slavery and Human Trafficking Statement

- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Managing Director approval

This statement has been approved by the organisation's Managing Director, who will review and update it annually.

Signed: 

Name: Ian Turner Position: Managing Director

Date: 3rd March, 2018