



## Modern Slavery and Human Trafficking Policy

### 1. Policy Statement

Rosbo LTD has a zero-tolerance approach to modern slavery and human trafficking in all forms.

We are committed to acting ethically and with integrity in all business dealings and relationships, and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere within our business or supply chains.

We recognise our responsibilities under the Modern Slavery Act 2015 and are committed to upholding its principles regardless of company size or turnover.

This policy applies to:

- Employees
- Directors
- Subcontractors
- Agency workers
- Suppliers
- Labour providers
- Any other parties acting on behalf of Rosbo LTD

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### 2. Definition of Modern Slavery

Modern slavery can take many forms, including:

- Slavery
- Servitude
- Forced or compulsory labour
- Human trafficking
- Debt bondage
- Exploitation through coercion, deception or abuse of power

It involves the exploitation of individuals for personal or commercial gain.

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### 3. Our Business & Supply Chain

Rosbo LTD operates within the construction sector, providing roofing, carpentry and skylight installation services.

## Rosbo LTD T/A Rosbo Roofing, Carpentry & Skylights

4 Western Road

Bletchley

MK22PT

Company Registration: 13058965

[www.rosboroofting.com](http://www.rosboroofting.com)

info@rosboroofting.com

Our supply chain may include:

- Building material suppliers
- Tool and equipment suppliers
- Waste management providers
- Subcontract labour
- Scaffold contractors
- Specialist installers

We acknowledge that construction can be considered a higher-risk sector for labour exploitation and therefore take proactive measures to reduce risk.

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## 4. Our Commitment

Rosbo LTD commits to:

- Ensuring all workers are employed voluntarily
- Verifying the right to work of all employees and subcontractors
- Ensuring fair and lawful payment practices
- Avoiding engagement with suppliers involved in unethical labour practices
- Taking immediate action if concerns are raised

We will not knowingly engage with any organisation or individual involved in modern slavery.

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## 5. Recruitment & Employment Practices

We operate fair recruitment procedures, including:

- Verifying identity and right-to-work documentation
- Ensuring workers understand the terms of engagement
- Providing written agreements outlining pay and conditions
- Paying workers directly into their own bank accounts
- Prohibiting withholding of identity documents
- Prohibiting recruitment fees or financial penalties

We do not permit forced labour, bonded labour or involuntary work under any circumstances.

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## 6. Subcontractor & Supplier Due Diligence

Rosbo LTD expects suppliers and subcontractors to:

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- Comply with the Modern Slavery Act 2015
- Provide lawful employment practices
- Pay workers fairly and on time
- Ensure safe working conditions

Where appropriate, we may:

- Request confirmation of anti-slavery policies
- Conduct informal supplier checks
- Refuse to engage with non-compliant suppliers
- Terminate relationships where exploitation concerns arise

## **7. Risk Assessment**

We assess risk based on:

- Labour-only subcontract arrangements
- Use of agency workers
- Overseas supply chains
- Cash-based labour payments (which we avoid)

Higher-risk activities are subject to additional scrutiny.

## **8. Training & Awareness**

Rosbo LTD will:

- Promote awareness of modern slavery risks
- Encourage vigilance among management
- Ensure leadership understands warning signs

Indicators of modern slavery may include:

- Workers lacking control over personal documentation
- Signs of coercion or fear
- Poor living conditions
- Unusual payment arrangements
- Restricted freedom of movement

## **9. Reporting Concerns**

Concerns should be reported to the Director of Rosbo LTD.

Reports will be:

- Treated confidentially
- Investigated appropriately
- Acted upon promptly

No individual will suffer detriment for raising a genuine concern in good faith.

Where appropriate, concerns may be reported to relevant authorities.

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## **10. Consequences of Non-Compliance**

If modern slavery or exploitation is identified:

- Engagement will be suspended immediately
- Authorities may be notified
- Contracts may be terminated
- Internal disciplinary procedures may be initiated

Zero tolerance means zero exceptions.

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## **11. Continuous Improvement**

Rosbo LTD is committed to continual improvement by:

- Reviewing this policy annually
- Monitoring supply chain practices
- Evaluating risk exposure
- Updating procedures where necessary

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## **12. Responsibility**

Overall responsibility for this policy rests with the Director of Rosbo LTD.

All employees, subcontractors and suppliers are responsible for ensuring compliance with this policy.

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## **13. Policy Review**

This policy will be reviewed:

- Annually
- Following any legislative changes
- After any reported incident
- If significant changes occur within the business