



MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Modern slavery is a heinous crime and Coombes Forestry Ltd (COOMBES) operates a zero-tolerance commitment to slavery and human trafficking. Under the Modern Slavery Act 2015 (the “Act”), COOMBES is dedicated to ensuring that human trafficking, slavery, forced or compulsory labour and/or servitude does not take place at any point in our business or in our supply chains.

Our Structure and Supply Chains

COOMBES has 56 employees and approximately 200 agency workers, who are predominantly based across south-central England. COOMBES and its operations are entirely based in the UK.

Operating in the Rail, Forestry and Civil Engineering sectors, COOMBES bids to public, private and voluntary sector organisations for contracts for work through structured business development processes. We are also contracted directly by private landowners or businesses for forestry and vegetation works. Additionally, we hire out various heavy plant machinery.

To achieve its business objectives, COOMBES purchases or hires heavy plant machinery, vehicles, tools, mechanical equipment, PPE, IT hardware and peripherals and office equipment. In doing so, COOMBES works with nearly 200 suppliers, all of which are based in the UK. COOMBES considers therefore, that there is a relatively low risk of modern slavery and/or human trafficking occurring within its supply chain.

Due Diligence

COOMBES recognises that due diligence processes and reporting are essential management tools that improve risk identification.

Suppliers

We undertake stringent due diligence processes to ensure we only use suppliers who share our commitment to ethical practices. By working to secure a transparent supply chain through operating due diligence, COOMBES seek to prevent modern slavery from occurring in the course of our operations.

We undertake the following courses of due diligence:

- We commit to a Supplier Code of Conduct as part of our supplier onboarding process. We require suppliers to commit to meeting the provisions set out in our Supplier Code of Conduct.
- COOMBES has clear Supplier Application processes in place for supplier approval, which includes due diligence checks to assess the suitability of suppliers to provide goods and services against required standards.
- Obtain Modern Slavery statements from suppliers, where available.
- Vet suppliers so far as is possible of their own compliance with the requirements of the legislation.
- Our supply chain is routinely analysed by the Office Manager.
- Suppliers are removed from COOMBES’s Approved Suppliers List after 12months of inactivity. Suppliers will have to complete the registration process again to re-join.



Employees

We conduct all business in an ethical manner and are committed to being a transparent organisation. We do not consider there to be a high risk of slavery or human trafficking within COOMBES's work force; however, we undertake the following courses of due diligence across the Company:

- Robust recruitment processes incorporating 'right to work' document checks, proof of address, contracts of employment, payment of salaries into bank accounts under the respective employee's name and ensuring everyone employed is 16 years or above.
- Our Employee Handbook has a range of procedures to support in preventing modern slavery from occurring in our work place.
- We honour our responsibility to protect whistleblowers who highlight to us any risk of slavery or human trafficking at COOMBES. We have a Whistleblowing Policy in place affirming this commitment, which also details the procedure for reporting concerns.
- Our open and inclusive culture set the parameters for how we expect people to interact with colleagues, partners and customers.
- Everyone at COOMBES is required to comply with legal requirements at all times.

Future Performance Indicators

For our Business year 2021, we aim to develop and introduce Anti-slavery and trafficking training for COOMBES employees involved with our suppliers, in particular Purchasing, Accounts and Managers.

COOMBES takes responsibility for this Statement and its related objectives, and to review and update it in accordance with the Act.

This policy will be regularly reviewed (minimum annually).

Signed on behalf of Coombes Forestry Limited

Managing Director – Shane Coombes

December 2020