

# Modern Slavery and Anti-Trafficking Policy

## 1. Introduction

- 1.1. This statement has been produced in accordance with the Modern Slavery Act 2015 and sets out the actions that DOKA will take to understand potential modern slavery risks related to its business activities and supply chains. This statement relates to actions and activities during the current financial year.
- 1.2. DOKA are committed to preventing Modern Slavery & Anti-Trafficking in its business activities and its supply chains and detailed below are actions that have been implemented, and will continue to be, with the aim of fulfilling this commitment.

### 2. About DOKA

2.1. DOKA are Formwork experts and are world leaders in developing, manufacturing and distributing formwork technology for use in all fields of the construction sector. DOKA have more than 160 sales and logistics facilities in over 60 countries which ensures that equipment and technical support are provided swiftly and professionally.

### 3. Understanding the Risks of Modern Slavery

The key direct risks of Modern Slavery to DOKA are:

- 3.1. No contracts of employment including zero hours' contracts;
- 3.2. Under pay of employees, self-employed contractors and subcontract companies not paying as a minimum the living wage, and not paying an appropriate market rate for services engaged;
- 3.3. Excessive working hours
- 3.4. Rest periods between shifts or as a minimum a day off per fortnight;
- 3.5. Not been entitled to work in the country of employment;
- 3.6. Poor physical working conditions, including safety conditions;
- 3.7. Bullying, discrimination and harassment.

## 4. Due Diligence

We shall ensure that:

- 4.1. Individuals have the right to work in the country of employment.
- 4.2. As a minimum the National Minimum Wage is paid.
- 4.3. Pay reflects current market values for the sector and role.
- 4.4. Working hours restrictions are complied with, and excessive working hours discouraged.
- 4.5. Bullying, discrimination and harassment is not permitted or tolerated in any form.
- 4.6. Site conditions are safe and provide a working environment conducive to the protection of the environment, human health and quality workmanship.
- 4.7. Our contractual requirements require that modern slavery is not permitted.
- 4.8. We expect our customers to deliver the same ethical treatment of us as a supplier, particularly in regards to payment terms and conditions, rates of pay and timely payment of applications.

## 5. Staff Training

5.1. We will provide all management staff training in relation to modern slavery.

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## 6. Assessing Effectiveness

6.1. The delivery of this modern slavery policy shall be monitored and shall form part of annual management performance review.

## 7. Corrective Actions

7.1. Should an occurrence or potential occurrence of modern slavery be identified, either internally related to employment practice or working conditions or externally with the supply chain then appropriate corrective action shall be taken in line with the company's Control of Non-Conformity Procedure. All non-conformity shall be recorded and the required actions implemented in a timely manner.

### **Policy Review**

This will be subject to review following any lessons learnt, identification of non-compliance and as a minimum annually.

### **Policy Approval**

As the individual ultimately responsible for company compliance I endorse this policy.

Endorsed by the Company Directors

Name & Position: Lee Davidson – Managing Director

Signature: Lee Dordm

Dated: 01/04/2024

Due to be reviewed by: 01/04/2025