



# **BUSINESS MANAGEMENT**

## *Modern Slavery and Trafficking Policy*

2 Birksland Street, Bradford, BD4 8UX  
Tel (USA): +1 (855) 252 3387 Tel (UK/EU): +44 (0) 333 370 1589  
Web: [www.bladewindservices.com](http://www.bladewindservices.com)  
UK Company Registration: 10273919



# TABLE OF CONTENTS

<b>AMENDMENTS</b> .....	<b>2</b>
<b>1 INTRODUCTION</b> .....	<b>4</b>
1.1 THE COMPANY .....	4
1.2 MODERN SLAVERY MANAGEMENT SYSTEMS .....	4
<b>2 PLAN – MODERN SLAVERY POLICY</b> .....	<b>6</b>
2.1 STATEMENT OF MODERN SLAVERY POLICY .....	7
2.2 ORGANISATIONAL HIERARCHY.....	8
2.3 DUTIES AND RESPONSIBILITIES .....	9
2.3.1 <i>Company</i> .....	9
2.3.2 <i>Employees</i> .....	9
<b>3 DO – MODERN SLAVERY MANAGEMENT</b> .....	<b>10</b>
3.1 SLAVERY .....	10
3.2 SERVITUDE .....	10
3.3 FORCED OR COMPULSORY LABOUR.....	10
3.4 HUMAN TRAFFICKING .....	10
3.5 TRAINING .....	11
<b>4 CHECK – MONITOR PERFORMANCE</b> .....	<b>12</b>
4.1 INCIDENT MANAGEMENT .....	12
4.1.1 <i>Reporting</i> .....	12
4.1.2 <i>Recording</i> .....	12
4.1.3 <i>Investigating</i> .....	12
<b>5 ACT – REVIEW AND AUDIT</b> .....	<b>13</b>
5.1 REVIEW .....	13
5.2 AUDIT.....	14
<b>APPENDIX 1 INFORMATION</b> .....	<b>15</b>

# 1 INTRODUCTION

## 1.1 THE COMPANY



Blade Wind Services Ltd provides specialist services to the wind energy sector. With a truly global service our team of expert technicians provide a range of services for wind turbine generators (WTG) including, but not limited to:

- Wind turbine inspections.
- Rotor blade and tower cleaning.
- Rotor blade repairs.
- Wind turbine performance upgrades.
- Wind turbine planned maintenance programme.

The Company has a focus on safety and quality having a professional yet personal approach to ensure we understand our Clients and their site objectives.

Our support enables our Clients to reduce their site downtime, maximise their asset performance and increase their overall medium to long-term margins.

## 1.2 MODERN SLAVERY MANAGEMENT SYSTEMS



Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as:

- Slavery.
- Servitude.
- Forced and compulsory labour.
- Human trafficking.

The *Modern Slavery Act 2015* also includes child slavery, slavery in supply chains and forced or early marriage and all of these forms have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Blade Wind Services Ltd have a zero-tolerance approach to modern slavery and 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 own business or in any of our supply chains

The Company is committed to ensuring that modern slavery and human trafficking is eradicated. This commitment includes ensuring that organisations we work with are also committed to this aim and to promote transparency and accountability throughout all supply chains. In turn this will have a positive impact on reducing instances of injustice and brutality which are indicative of modern slavery and human trafficking.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the *Modern Slavery Act 2015*. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This Policy sets out our Modern Slavery rules and explains what is expected of Employees and others. Acts of bribery or corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly. The Policy applies to all persons working for us or on our behalf in any capacity.

The Company is acutely aware of the importance of ethical behaviour to our relations with stakeholders and we are proud of our high ethical standards, but we cannot be complacent about the threat of bribery and corruption in our business.

Our principles deal with “integrity” and also “openness and transparency”. This Policy is part of those principals and commitments.

The HSE publication *HSG65 Managing for Health and Safety* methodology is followed in order to establish a framework for a Modern Slavery Management System of which this Policy is the cornerstone.

HSG65 promotes a simple message that organisations need to manage Health and Safety with the same degree of expertise and to the same standards as other core business activities, if they are to effectively control risks and prevent harm to people.

This is the approach adopted by the Company with assistance from our Health, Safety and Environment Advisors – MD Safety Management.



The "Plan, Do, Check Act" framework allows the organisation to identify the key actions needed in each part of the cycle and relate them back, where appropriate, to leadership, management, worker involvement and competence.

The framework is based on a plan that is proportionate to the risks. A summary of the steps involved is given below:



- ✓ An effective Modern Slavery Policy sets the strategic direction of the organisation.
- ✓ Planning and coordination of the Policy is essential for the Management System to be effective.



- ✓ Identify the risk profile of the organisation.
- ✓ Coordinate the actions of those responsible for controlling the risks.
- ✓ Implement the Risk Control System (RCS).



- ✓ Monitoring the effectiveness of the Risk Control System is vital to measure performance.
- ✓ Investigating accidents and incidents will help prevent recurrence and improve performance.



- ✓ Regular audit and review will enable confirmation if existing arrangements are still valid.
- ✓ Incorporating results will allow learning lessons for personnel and the organisation.

## 2 PLAN – MODERN SLAVERY POLICY

A Modern Slavery Policy is:



*A written statement by an employer stating the understanding that modern slavery is a crime and a violation of fundamental human rights. It is a commitment to acting ethically and with integrity in all business dealings and relationships and to ensure modern slavery is not taking place anywhere in the business, or any supply chain.*

An effective Modern Slavery Policy sets a clear direction for the organisation to follow.

The Policy contributes to all aspects of business performance as part of a demonstrable commitment to continuous improvement.

Responsibilities to people and the environment are met in ways that fulfil the spirit and letter of the law.

Stakeholders' expectations in the activity (whether they are shareholders, Employees, Clients or society at large) are satisfied.

There are cost-effective approaches to preserving and developing physical and human resources, which reduce financial losses and liabilities.

An effective management structure and arrangements are in place for delivering the Modern Slavery Policy.

Staff are motivated and empowered to work to agreed standards.

The arrangements are:

- Underpinned by effective staff involvement and participation.
- Sustained by effective communication and the promotion of competence that allows all Employees to make a responsible and informed contribution.

There is a shared common understanding of the organisation's vision, values and beliefs. A positive culture is fostered by visible and active leadership.

Blade Wind Services Ltd is controlled by its Directors, namely Steve Robinson, Mark Bell and Jamie Bairstow.

Steve Robinson is identified as the Director with responsibility for Health and Safety. Where and when appropriate, there may be delegation of some Health and Safety duties to a Health and Safety Coordinator or to a specifically nominated person on a defined basis.



Blade Wind Services Ltd is committed to a management framework which pursues continual and progressive improvement to ensure compliance with employment legislation such as the *Modern Slavery Act 2015*. The Act concerns offences relating to human trafficking and slavery and imposes a legal obligation on organisations to ensure transparency in supply chains. Definitions include:

- **Slavery** - where ownership is exercised over a person.
- **Servitude** - involving coercion to oblige a person to provide services.
- **Forced or compulsory labour** - where a person works on a non-voluntary basis under the threat of a penalty.
- **Human trafficking** - involving arranging or facilitating the travel of a person with a view to exploiting them.

This Statement, pursuant to section 54(1) of the *Modern Slavery Act 2015* constitutes the Company's Modern Slavery Policy. Blade Wind Services Ltd has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships to ensure modern slavery is not taking place in our own business or in our supply chain. To ensure there is transparency in our core business the Company will:

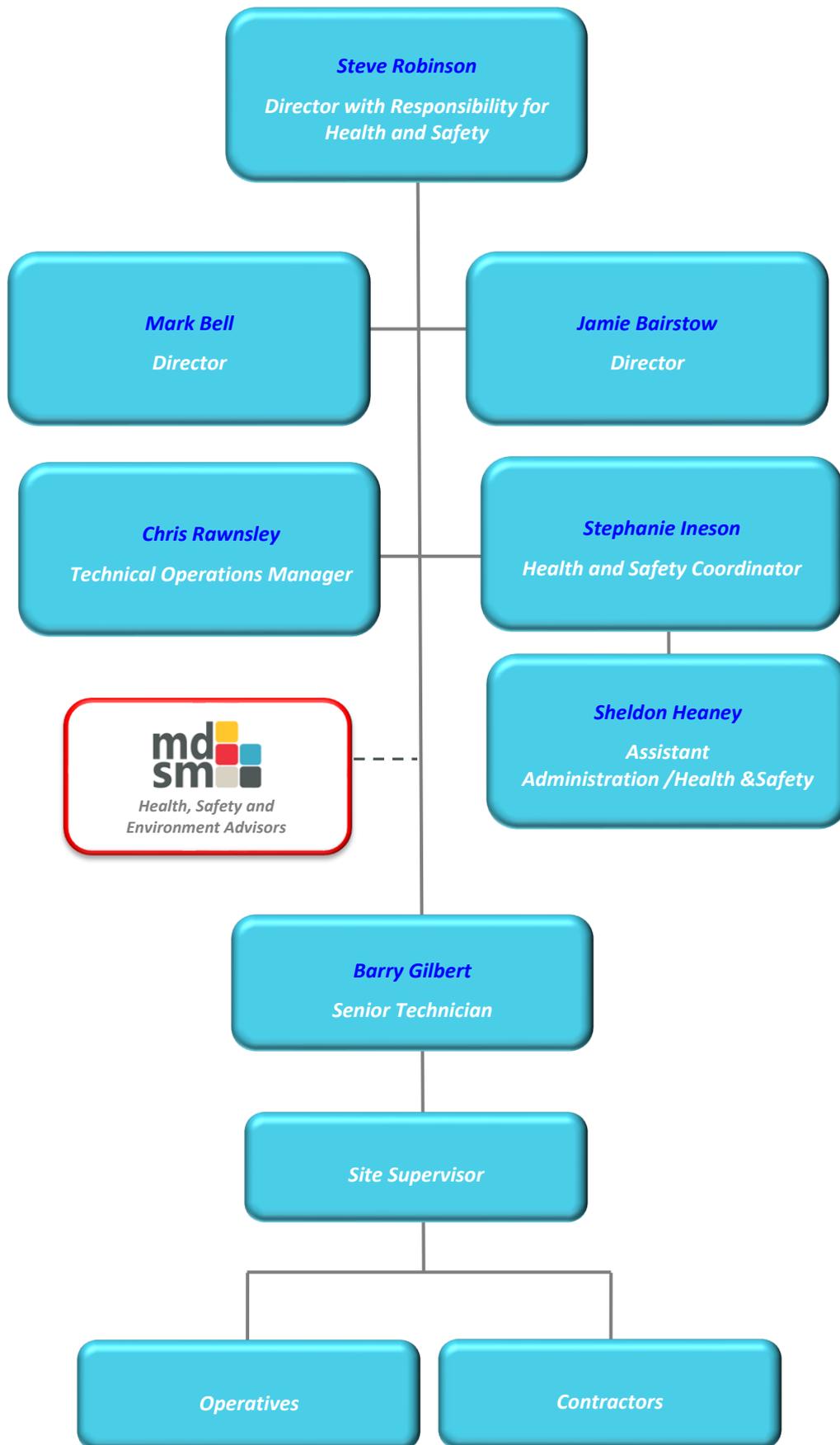
- Ensure appropriate training is given to all Employees and as part of the Company induction process.
- Communicate our zero-tolerance approach to modern slavery to our Suppliers, Contractors and Business Partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Blade Wind Services Ltd also takes appropriate steps to ensure that there is no modern slavery or human trafficking in our supply chains. This includes:

- Requiring new suppliers to declare that they are not involved in modern slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking
- Requiring our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their own supply chains.
- Assessing any instances of non-compliance with on a case-by-case basis and identifying appropriate remedial action.

Blade Wind Services Ltd will ensure the continuous monitoring and the regular review of the company's Modern Slavery Policy Statement to ensure its objectives are met. To this aim the Company will ensure that the Policy is reviewed and updated at regular intervals to reflect legislative and/or organisational changes.

<b>Name:</b>	<b>Steve Robinson</b>
<b>Signature:</b>	
<b>Position:</b>	<b>Director with Responsibility for Health, Safety and the Environment</b>
<b>Date:</b>	<b>26<sup>th</sup> March 2019</b>



### 2.3.1 Company

The Company is responsible for:

- Ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- Ensuring that Employees at all levels are aware of their responsibilities for ensuring those reporting to them are made aware of and understand this Policy and undertake training on how to implement and adhere to it.
- Ensuring compliance with the Policy and ensuring Employees and others disclose any suspected danger or wrong-doing.
- Monitoring the use and effectiveness of this Policy (and dealing with any queries on its interpretation).

### 2.3.2 Employees

Employees (and others) are responsible for:

- Complying with this Policy in not participating in any form of behaviour that may constitute a breach of the Policy.
- Raise any concerns you may have where you are unsure of a particular act, the treatment of workers more generally or their working conditions so that the situation can be clarified.
- Notifying the Company as soon as possible if there is a belief or suspicion that a breach of or conflict with this policy has occurred or may occur in the future. Failure to do so may result in liability for Blade Wind Services Ltd and for Employees personally.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring 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 own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Company immediately.

- Remaining aware that any Employee who breaches this policy will face disciplinary action, which could result in dismissal.

### 3 DO – MODERN SLAVERY MANAGEMENT

Modern Slavery Management Arrangements are those that:



*comprise the framework of processes and procedures used to ensure that an organisation can fulfil all tasks required to achieve its objectives through a process of continuous improvement*

There is a planned and systematic approach to implementing the Modern Slavery Policy through an effective management system.

The aim is to minimise risk of non-compliance by increasing awareness and generating clear guidelines.

Areas in which the Company has clear guidelines is set out in the following sections which detail each topic giving definitions where necessary to ensure clear understanding.



---

#### 3.1 SLAVERY



Slavery is a situation in which ownership is exercised over a person and can often involve physical abuse or dehumanised treatment.

Blade Wind Services Ltd will not tolerate such a situation and if an Employee is aware of a scenario then they report it immediately to Blade Wind Services Ltd when safe to do so.

---

#### 3.2 SERVITUDE



This involves coercion to oblige a person to provide services and may include forms of physical or mental abuse, blackmail or other forms of exploitation. The scale of modern slavery in the UK is significant. Crimes of servitude are being committed across the country and there has been year on year increases in the number of victims identified.

Blade Wind Services Ltd will not tolerate such behaviours and adopt a zero-tolerance approach.

---

#### 3.3 FORCED OR COMPULSORY LABOUR



This is a scenario where a person works on a non-voluntary basis under the threat of a penalty. This is often characterised by threats and forms of exploitation such as constraints and restrictions placed on freedom of movement.

Blade Wind Services Ltd endeavours to identify scenarios where this could occur and are committed to our standards and will undertake due diligence to ensure instances like this do not occur.

---

#### 3.4 HUMAN TRAFFIKING



Human trafficking involves arranging or facilitating the travel of a person with a view to exploiting them. Whilst often not considered to be part of the modern UK business landscape it is an increasing issue across the country.

Blade Wind Services Ltd exercises due diligence in all scenarios where the arrangement of travel in any capacity is managed in any way. This involves arriving in or entering a country, departing from a country and travelling within a country.

---

### 3.5 TRAINING



The Blade Wind Services Ltd zero-tolerance approach to modern slavery must be communicated to all Suppliers, Contractors and other business contacts at the outset of our business relationship with them and as appropriate thereafter. In order to achieve compliance, the Company ensures training and briefing on a regular basis.

Training on this Policy forms part of the induction process for all new employees. All existing employees are required to undertake the relevant training on how to implement and adhere to this Policy.

## 4 CHECK – MONITOR PERFORMANCE

Performance is measured against agreed standards to reveal when and where improvement is needed.

Active self-monitoring reveals how effectively the Modern Slavery System is functioning. If controls fail, reactive monitoring discovers why by investigating any instances where there has been a breach of this Policy.

The objectives of active and reactive monitoring are:

- To determine the immediate causes of sub-standard performance.
- To identify the underlying causes and the implications for the design and operation of the Modern Slavery Management System.
- To monitor longer-term objectives.



---

### 4.1 INCIDENT MANAGEMENT



The Company will so far as is reasonably practicable, ensure that appropriate systems are in place to manage instances of non-compliance in relation to this Modern Slavery Policy.

#### 4.1.1 Reporting

The Company require Employees, Contractors, Visitors, etc. to report any incident or breach of this Policy occurring during the Company's operations.

#### 4.1.2 Recording

The Company will ensure that comprehensive recording in the event of receiving information that may indicate a breach of this Policy.

#### 4.1.3 Investigating

The Company will so far as is reasonably practicable, ensure that all adverse events are investigated. The nature and outcome of an adverse event will determine whether a formal documented investigation is warranted.

The Company will identify underlying or root causes and where lessons to be learnt are identified, the Company will ensure that these are fed back to Employees so as to reduce the possibility of a recurrence.

## 5 ACT – REVIEW AND AUDIT

Performance is measured against agreed standards to reveal when and where improvement is needed.

Self-monitoring reveals how effectively the Modern Slavery Policy is functioning.

Monitoring processes look at people, procedures and systems including individual behaviour and performance.

It is the duty of the Director with Responsibility for Health and Safety to arrange for the Modern Slavery Policy to be reviewed as often as appropriate.



---

### 5.1 REVIEW



It is the duty of the Director to arrange for the Policy to be reviewed as often as appropriate. Circumstances, which may cause the Policy to be reviewed, could include:

- Reporting of, or evidence of, any instance of exploitation.
- New work practices, which can cause a change in the nature of Company operations and can, lead to changes in training requirements.
- New contracts in different industry sectors where financial practices are less understood than in current ones.
- Experience that requires addition to the old Policy.
- New Legislation requirements, which require addition to the Policy and may require the identification of further duties within the Company.
- Company re-organisation that can lead to the redefinition of duties and responsibilities.

Monitoring of the Policy is the responsibility of the Director with Responsibility for Health and Safety. Observation of the workplace, feedback from Employees, noting any increase in incidents, etc. will be used by the Director with Responsibility for Health and Safety as important indicators to monitor the success of the Policy.

Each Employee is made aware of the location of the Company Modern Slavery Policy. Each Employee is given a suitable timescale in which to read the Policy in order to fully understand the duties and arrangements that are contained in it.

Company Management is available to answer queries or issues that any Employee may have regarding its contents. Where clarification is required then the Company may also enlist the services of Business Advisors to ensure that the query can be answered in the most effective way that can be most easily understood.

After reading the Modern Slavery Policy and ensuring that he/she is satisfied that they understand the contents, each member of staff signs and dates the "Declarations". When amendments are made to the Policy Employees are informed of the change in issue status of the document and are given time to understand the changes made and any implications arising out of them. Subsequently Employees are required, once again, to sign and date the "Declarations".

The aims of auditing are to establish that:

- Appropriate management arrangements are in place.
- Adequate risk control systems exist, are implemented, and consistent with the hazard profile of the organisation.
- Appropriate precautions are in place.

In conjunction with our Business Advisors (MD Safety Management Limited) an annual documents audit is also undertaken to ensure that all documentation comprising the Management system is reviewed and updated to reflect changes in the Company as well as Legislation and also industry best practices.

## APPENDIX 1 INFORMATION

In order to ensure continuing legal compliance and to manage the Modern Slavery Policy the Company uses information and guidance provided by:

<p><i>GOV.uk</i></p>		<p><a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/383764/Modern_Slavery_Strategy_FINAL_DEC2015.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/383764/Modern_Slavery_Strategy_FINAL_DEC2015.pdf</a></p>
<p><i>The Modern Slavery Act 2015</i></p>		<p><a href="http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_2015030_en.pdf">http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_2015030_en.pdf</a></p>
<p><i>Anti-Slavery</i></p>		<p><a href="http://www.antislavery.org/english/slavery_today/what_is_modern_slavery.aspx">http://www.antislavery.org/english/slavery_today/what_is_modern_slavery.aspx</a></p>



**working with**



**Policies Assessments**  
**Training Consultancy**

[www.mdsm.org.uk](http://www.mdsm.org.uk)

[info@mdsm.org](mailto:info@mdsm.org)

**0844 335 1499**



*MD Safety Management Limited is a Health and Safety Consultancy with over 30 years' experience in Nuclear, Chemical, Construction, Retail, Leisure and Environmental Sectors we provide tailored and cost-effective services to our varied Client-base.*

*MD Safety Management Limited is working with **Blade Wind Services Ltd** in order to implement a Safety Management System and ensure that this is monitored and updated to comply with Health and Safety and associated Legislation.*

