

Anti Modern Slavery

(Self Assessment Questionnaire)



Business Unit Details

Region *

Services Benelux

Business Unit *

Altrad Services Belgium

Managing Director

Jan De Swert

Local Compliance Officer

Raf De Cort

Do you hire manpower from overseas?
*

No

Do you use agencies to hire
manpower? *

Yes

Do you hire manpower from sub
contractors? *

Yes

Links to policies, procedures and other resources

Note:

The links below may vary for different regions due to different AGMS SharePoint portals.

[Modern Slavery Statement](#)

[Business Integrity & Ethics Code](#)

[Whistleblowing Policy](#)

[Modern Slavery and Human Trafficking Policy](#)

[Expectations of Our Suppliers Policy](#)

[Management of Intermediary Policy](#)

These policies are available in different languages on the following link:

<https://hertel.sharepoint.com/:f:/r/sites/AltradGroup/AGMS/PU%20Compliance/Procedures%20and%20Guidelines?csf=1&web=1&e=1QFMCf>



Supply Chain Considerations

1.1 Has your Business Unit received Altrad Group's Modern Slavery and Human Trafficking Policy?

Yes/No *

No

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

roll out of all policies foreseen before 31/08/2022

1.2 Does the selection of new suppliers include a due diligence process in their pre-qualification?

Yes/No *

Yes

1.2a Does the due diligence process cover topics in anti-modern slavery and human trafficking?

Yes/No *

Yes

1.2b Is the due diligence process performed through GAN Integrity Portal?

Yes/No *

No

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

pre screening process in place since several years, integration in Gan to be discussed with Emmanu

1.3 Have you cascaded Altrad's policy on Modern Slavery and Human Trafficking to your Suppliers/Vendors?

Yes/No *

No

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

included in existing screening, policies will be added to contracts

1.4 Do your purchase orders or formal agreements incorporate clauses on Anti-Modern Slavery compliance requirements?

Yes/No *

No

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

to be taken up with procurement

1.5 Do the provisions of agreements with the key suppliers give your Business Unit right to conduct Supplier Audit?

Yes/No *

No

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

not included in current contracts except for subcontractors, contracts to be updated to ensure rigl

1.6 Does your Business Unit's risk mapping include risk factors arising from counterparties' non-compliance with modern slavery, child labour or forced labour regulations?

Yes/No *

Yes

1.7 Does your Compliance training program for Business Unit's 'at risk' employees include Modern Slavery and Human Trafficking policy?

Yes/No *

Yes

Modern Slavery in the Supply Chain

Altrad Group adheres to the principles of the Universal Declaration of Human Rights, the International Labour Organisation, the Organisation for Economic Co-operation and Development (OECD) and applicable country laws. The Group specifically emphasises the respect of Human Rights and the promotion of these fundamental principles by its suppliers.

The Group has devised a formal policy i.e. Modern Slavery and Human Trafficking Policy. The policy applies to all Altrad Group Employees, directors, officers, consultants, contractors, agents, representatives, business partners, sponsors, interns, casual workers, seconded workers and agency workers.

I agree to the above statement *

Please upload supporting documents, illustrations and examples of actions already in place

No files uploaded



Documentation & Monitoring

2.1 Are you aware of the supply chain mapping requirements for monitoring the modern slavery aspects of our critical suppliers?

Yes/No *

Yes

2.1a Do you map your supply chain and document its related risks?

Yes/No *

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

No

meeting with procurement foreseen to arrange this

2.2 Is special attention given to overseas suppliers, especially from countries with high risk of modern slavery, forced labour and/or child labour?

Yes/No *

Yes

2.3 Have you become aware if any of your suppliers have been found to be involved in modern slavery practices?

Yes/No *

No

Monitoring Supply Chain

Monitoring the supply chain is an important aspect of Anti Modern Slavery legislations we are subject to comply with as a Group.

Supply Chain Mapping

Supply chain mapping is a process whereby the business units can document their supply chain for the strategic goods and services procured up to their core source. This is relatively new concept and further guidance are expected to be issued.

I agree to the above statement *

Please upload supporting documents, illustrations and examples of actions already in place

No files uploaded



Recruitment Fees for Candidates

3.1 Do the agreements with agencies clearly mention that the candidates will not be charged for any recruitment or visa fees?

Yes/No *

N/a

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

headhunting or tempin agencies - no issue with this

3.2 Are the candidates briefed about the free recruitment policy when being interviewed or when their trade tests are being conducted in their home countries?

Yes/No *

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

No

not necessary (because not possible) in BE legislation

3.3 Do you obtain reasonable assurance that local, sub or village agents or our own employees do not charge any fees to the candidates?

Formal Structured Feedback from Manpower During Onboarding

No

Prohibition of Using Subagents, Local or Village Agents

No

Agreement Clause Extends to Local, Sub or Village Agents

No

Other

No

Free Recruitment

Altrad Group has a strict policy against all forms of modern slavery and human trafficking. As part of this policy, all the manpower (including overseas) is not required to pay any fee to the recruitment agency and therefore the Business Units operate a free recruitment policy.

I agree to the above statement *

Please upload supporting documents, illustrations and examples of actions already in place

No files uploaded



Whistleblowing Procedures & Briefings

4.1 Have the whistleblowing policy and the purpose of speak-up posters been briefed to staff through training (such as toolbox talks or similar sessions)?

Yes/No *

No

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

foreseen in the next months

4.2 Is the attendance record to these briefings created and signed by attendees?

Yes/No *

Yes

4.3 Had the trainers providing whistleblowing training undergone compliance training before conducting these sessions?

Yes/No *

Yes

4.4 Have whistleblowing posters (Speak-up) been displayed at all recommended areas such as office main notice boards, pantries (dining areas), site offices, yards and company provided accommodations?

Yes/No *

No

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

not yet

4.5 Does the training include creating awareness on how to find employment opportunities on agencies' online resources such as Facebook, newspapers or other online sources?

Yes/No *

No

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

not sure why this should be in the program

4.6 Are sub-contracted employees aware of Altrad whistleblowing (speak-up) program?

Yes/No *

Yes

Reporting Concern(s)

For any untoward practice during overseas recruitment or treatment in their work environment, our manpower should be able to report their complaints without any fear of retaliation. Altrad Group has implemented a whistleblowing policy and has a whistleblowing hotline where Altrad staff at all levels can report any concerns while maintaining their identity anonymous.

I agree to the above statement *

Please upload supporting documents, illustrations and examples of actions already in place

No files uploaded



Passport Safekeeping

5.1 Does the business unit have employees' passports entrusting policy and practice of safekeeping employees' passports (or other travel documents)?

Yes/No *

No

Freedom of Movement - Passports

Overseas manpower passports are one of the most important travel documents. It is against the law to retain employees' passport without their consent. However, due to a lack of suitable arrangements in individual rooms at the company provided accommodations, some employees may choose to entrust their passports with their business unit for safekeeping. Care must be exercised to ensure that the Business Units are not seemed to be withholding passports against employees' will and to restricts their movements.

I agree to the above statement *

Please upload supporting documents, illustrations and examples of actions already in place

No files uploaded



Bonds or Similar Deposits

6.1 Does the business unit refrain from obtaining any bond money or deposits from employees or does not withhold salaries of its manpower to ensure completion of their contract period?

Yes/No *

Yes

6.2 Does the business unit ensure that recruitment agencies also do not obtain any deposits for the same purpose?

Yes/No *

Yes

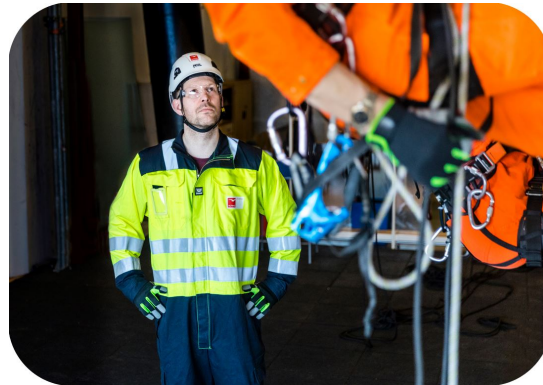
Freedom of Movement - No Bonds or Deposits

The Group always emphasises employment at-will. The Business Units should never collect any bond/deposit or withhold salaries of its manpower for 'ensuring' completion of their contracts.

I agree to the above statement *

Please upload supporting documents, illustrations and examples of actions already in place

No files uploaded



Policy Communication to Manpower Agencies

7.1 Have Altrad BIEC code and anti-modern slavery related policies been communicated to the manpower recruitment agencies?

Yes/No *

No

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

to do in the next months

7.2 Are your manpower recruitment agencies required to provide an annual declaration of compliance with anti-modern slavery, BIEC and related policies?

Yes/No *

No

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

to be included in future contracts

Compliance Policies Communication

Altrad Business Integrity & Ethics Code (BIEC) and related policies also extend to Manpower Recruitment agencies and therefore should be communicated to them.

I agree to the above statement *

Please upload supporting documents, illustrations and examples of actions already in place

No files uploaded



Reputable & Licensed Agencies

8.1 Are license copies of all recruitment agencies available and up-to-date?

Yes/No *

Yes

8.2 Are all sub-contractors license and other related documents obtained?

Yes/No *

Yes

Only Licensed Agencies

The Business Units are required to engage in business only with manpower agencies and / or sub-contractors that are licenced with their respective government departments to avoid any legal implications. Therefore the Business Units should obtain copies of trade / commercial licenses of manpower agencies or subcontractors being engaged.

I agree to the above statement *

Please upload supporting documents, illustrations and examples of actions already in place

No files uploaded



Employment Agencies Onboarding

9.1 Are the manpower agencies' key staff provided with Altrad BIEC/Compliance training?

Yes/No *

Yes

9.2 Is the compliance training by key employees of manpower agencies required to be completed at least every two years?

Yes/No *

No

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

usually employed shorter than 2 years

9.3 Is training provided once a new key employee working for manpower agencies is identified?

Yes/No *

Yes

Agencies On-boarding

Agencies' management and key staff should be provided training on Altrad Policies and procedures. This is required to ensure that our commitment to ethical business practices is reflected in our supply chain. A 'key employee' of the manpower agency is the either senior management personnel, staff dealing with us directly and those mainly involved in recruitment for our business units.

I agree to the above statement *

Please upload supporting documents, illustrations and examples of actions already in place

No files uploaded



Employees Onboarding

10.1 Does the induction training on the arrival of operatives include policies on modern slavery, whistleblowing and other related matters?

Yes/No *

No

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

at this moment distribution of policies for non at risk staff (in onboarding)

Employees Onboarding

The induction training for staff and operatives at arrival should include policies on Anti Modern Slavery, Whistleblowing, related policies and their employment rights.

I agree to the above statement *

Please upload supporting documents, illustrations and examples of actions already in place

No files uploaded



Pre Qualification Process and Compliance Monitoring

11.1 Have the manpower recruitment agencies gone through due diligence review process and only vetted agencies are used to recruit manpower?

Yes/No *

Yes

11.1a Is the management team of the business unit and the region involved in the pre-qualification process of manpower recruitment agencies?

Yes/No *

No

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

only HR involved

11.2 Is due diligence of manpower recruitment agencies also done using the GAN integrity portal?

Yes/No *

No

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

not yet, to be implemented Other system in place now

11.3 Is the due diligence process for manpower recruitment agencies repeated every 2 to 3 years?

Yes/No *

No

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

government list of compliant temping agencies exists

11.4 Are the manpower sub-contractors subject to pre-qualification process?

Yes/No *

Yes

11.4a Is it ensured that the sub-contractors have the policy that the operatives hired by them do not have to pay any kind of recruitment fee, visa costs or flights tickets etc?

Yes/No *

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

No

to be implemented in contracts

11.4b Are the passport entrusting procedures of manpower sub-contractors reviewed as part of pre-qualification to ensure that their practices are in line with Altrad policy?

Yes/No *

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

N/a

NA in this region, only EU workers hired

11.4c Is it ensured that the sub-contractors have the policy of not obtaining any deposits or bonds from the manpower as 'assurance' of contract completion?

Yes/No *

Yes

11.4d Are trade references of sub-contractors obtained?

Yes/No *

Yes

11.5 Is due diligence of manpower subcontractors also done using the GAN integrity portal?

Yes/No *

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

No

to be implemented, other system in place

11.6 Is the due diligence process for sub-contractors repeated every 2 to 3 years?

Yes/No *

Please briefly describe action plan for implementation and/or reason why it is not applicable. *

No

to be discussed internally how to implement

Due Diligence of Manpower Recruitment Agencies and Sub-contractors

Like other suppliers and service providers, manpower agencies and/or manpower sub-contractors must go through pre-qualification due diligence before their appointment. The due diligence process must be repeated every 2 to 3 years.

Since our contracting and even some equipment hire and sale companies employ services of manpower sub-contractors, therefore, Altrad business units need to be vigilant and obtain reasonable assurance that no modern slavery practices prevail within their sub-contractors.

I agree to the above statement *

Please upload supporting documents, illustrations and examples of actions already in place

No files uploaded



Timely Compensation of Operatives

12.1 During the last 12 months, has there been any instance where by salaries and wages of manpower were delayed by more than 3 days?

Yes/No *

No

12.2 Have there been any complaints from the third party hired manpower of delays or non-payments of wages and salaries by the sub-contractors during the last 12 months?

Yes/No *

Yes

Details and corrective action plan *

paiement stop in summer, delay in validation of paiements at holding level

Timely Payment of Wages and Salaries

Timely compensation of operatives is one of Group's core strengths and therefore it is expected that any foreseen delay in payments to operatives should be anticipated and always be avoided.

I agree to the above statement *

Please upload supporting documents, illustrations and examples of actions already in place

No files uploaded



Business Units KPI's

Number of offices, sites (client locations), yards, workshops, camps and warehouses

64

Number of places where speak-up posters have been displayed in multiple languages

0

Coverage of speak-up posters displayed (%)

0

Action Plan

to be implemented before 31/08/2022 - no means available at this time

Number of staff and operatives as of end of the last month

1,078

Number of staff and operatives provided with AMS, speak-up/whistleblowing and related training during last 12 months

0

Coverage of employees provided with Anti-Modern Slavery training (%)

0

Action Plan

to be implemented before 31/08/2022 - no means available at this time

The Business Units are required to provide their staff at all levels awareness training and access to Speak-up whistleblowing hotline contact details. This is achieved through display of Speak-up posters and conducting training sessions.

A minimum benchmark of 90% coverage for Speak-up posters display and staff training has been set. If current score, as above is less than 90%, an action plan should be provided

Confirm Send Off

- By ticking, you confirm that all your responses are COMPLETE and FINAL. If you want to just "save" the draft of your form and return to it at a later date, leave the box unticked and click submit below.



"No mother deserves the pain of knowing that her child is a victim of Modern Slavery"