

Modern Slavery

1.0 Overview

Sustainable Building Services Limited (hereby known as “the company” in this policy) are committed to driving out acts of modern-day slavery and human trafficking within its business and that from within its supply chains, including sub- contractors, and partners. The company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the company and with suppliers of goods and services to the company.

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced, compulsory labour, and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

The company is committed to complying with all relevant legislation, ethical standards, and human rights as set out by the principles of the ILO/UN Guiding principles.

The company has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships. The company will not support or deal with any business knowingly involved in slavery or human trafficking.

1.1 Organisation structure, its business and supply chains

The company supplies services including property and building refurbishment, decarbonization of homes and installation of energy efficiency measures. Company services are carried out across the UK. The company supply chains include contractors for site work, contractors for waste removal, material suppliers, and specialist consultants. The current client base is varied and versatile and includes:

- Educational Authorities (incl. Universities and Schools)
- Housing Associations
- Local Authorities
- Blue light authority
- National Health Service
- Government Departments
- Framework providers

1.2 Policies in relation to slavery and human trafficking

The company have policies in place to promote the fundamental principles and rights at work for

- freedom of association and the effective recognition of the right to collective bargaining.
- the elimination of all forms of forced or compulsory labour.
- the effective abolition of child labour.
- the elimination of discrimination in respect of employment and occupation; and
- a safe and healthy working environment.

These are in the form of code of conduct and corporate responsibility policy, equality, diversity and inclusion policy, anti-bribery policy, health, safety and environmental policy, whistleblowing policy, safeguarding policy, and this policy statement.

2.0 Modern Slavery policy statement

The company prohibits the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. The company is committed to the following in order to address modern slavery in its business activities and supply chains.

- Conducting due diligence checks to identify and assess potential modern slavery risks in the operations and supply chains.
- Taking appropriate action to address any identified risks and working with suppliers and partners to improve their practices.
- Providing training to our employees and suppliers to increase awareness of modern slavery and how to identify and report any potential cases.
- Supporting clients and suppliers.
- Encouraging the reporting of any suspected cases of modern slavery and human trafficking.
- Regularly reviewing and monitoring policies and processes to ensure that they remain effective in preventing modern slavery and human trafficking.
- Protecting employees against any human rights violations, their freedom of movement and association, against unfair recruitment practices and ensure they have access to internal and external grievance processes.

The company will address and prohibit any practices that are known to contribute to the risk of modern slavery. In line with the annual review, the company will:

- Review business activities and identify the presence of associated contextual risk factors which will be considered through country and sector context, workforce demographics, and the characteristics of risk management processes or controls.
- Where multiple modern slavery risk factors are present, implying greater risk to workers, further investigations will be necessary and more vigorous measures may need to be developed in response.

The company is committed to ensuring there is transparency in the business and in the approach to tackling modern slavery throughout supply chains, consistent with disclosure obligations under the Modern Slavery Act 2015.

The company expects the same high standards from all its contractors, suppliers and other business partners. The same high standards are expected as part of contracting processes. It is expected that any company suppliers will hold their own suppliers to the same high standards.

The company is committed to implementing and enforcing effective processes and controls to ensure modern slavery is not taking place anywhere in the business or in any of the company supply chains. Over the past 12 months, the company has adopted this policy and ensured its compliance within its work activities.

2.1 Risk assessment and due diligence

There is an ongoing assessment of modern slavery risks throughout the company's activities and its supply chain. The company continuously monitors the risks of modern slavery in changing industry and ensures that it is reviewing the effectiveness of the controls that are in place. The company recruitment and people management processes ensure that all prospective employees are legally entitled to work in the UK and the company safeguards employees from any abuse or coercion.

As part of the company's due diligence processes into slavery and human trafficking, the supplier approval process incorporates a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources is continually monitored.

The company approval process ensures that the company does not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour. The company also vet clients on the same basis and a relationship will not be formed with any client who knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

The company reviews these processes annually to ensure continual improvement and performance. This review is in line with the company year-end which is 31st January, and this policy will be reviewed and reissued within 6 months of that date. This policy is also reviewed when required through changing needs, circumstances, and legislation.

2.2 Key performance indicators to measure effectiveness of steps being taken.

A key indicator is the number of investigations and potential victims of modern slavery identified within our business. Any investigations will be recorded and reviewed to identify routes and strategies to increase awareness or accessibility. These would include reviewing grievances, whistleblowing, and reports from stakeholders. Another is training and ensuring that all staff are trained at least annually on modern slavery and ways to identify potential victims.

2.3 Training on modern slavery and trafficking

Awareness of Modern Slavery is a company commitment and regular training and awareness on the matter is enforced. The following are examples of how to spot potential Slavery situations:

- Appear to be under the control of someone else and reluctant to interact with others.
- Few or no documents / personal identification, or someone else in control of their documents / passport.
- Few personal belongings, wear the same clothes every day or wear unsuitable clothes for work.
- Inappropriate clothing for the job and a lack of safety equipment.
- Not be able to move around freely.
- Be reluctant to talk to strangers or the authorities.
- Appear frightened, withdrawn, or show signs of physical or psychological abuse.
- Dropped off and collected for work always in the same way, especially at unusual times, i.e. very early or late at night.
- Houses or flats with too many people, all picked up or dropped off at the same time.
- Dependence on an employer for a number of services (such as accommodation, transport, and banking).
- No contract.
- Working excessive hours over long periods.
- No days off.
- Receiving little or no payment.

2.4 Responsibility and communication

The company Chairman, Director and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the company and within its supply chains.

This Policy takes into account and supports the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2015. The implementation and operation of this management system underlines our commitment to this policy.

This policy is communicated to all employees and contractors through company induction. Any changes will be internally communicated through briefings. Further awareness of this policy is reinforced through ongoing communication to employees in the form of toolbox talks / briefings / meetings and awareness sessions. A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the head office upon request.

This policy will be published on the company website and therefore available publicly to all interested parties.

This policy applies to all persons working for or on behalf of the company in any capacity, including but not limited to employees at all levels, directors, officers, agency workers, volunteers, apprentices, agents, contractors, external consultants, third-party representatives, and business partners.

It is the responsibility of all individuals to report any concerns of modern slavery to the managing director (responsible also for the prevention of modern slavery in the business) or the company chairman. The company will ensure that there are no repercussions for anyone who is raising concerns. The company are committed to ensuring that they take all concerns seriously and raise concerns, where appropriate to the modern slavery helpline or other relevant authority / organisation. The modern slavery & exploitation helpline can be contacted by telephone on 0800 0121 700 or concerns can be raised online through the website modernslaveryhelpline.org.

This policy has been approved and signed by the directors including the company chairman in line with the date stated below.

Gary Lawson

Gary Lawson – Managing Director – Sustainable Building Services (UK) Ltd

Date: 30 April 2024