

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introductory Statement from Director

Modern Slavery and human trafficking can take various forms including slavery, servitude, forced and compulsory labour, all of which have in common the deprivation of a person's liberty for personal or commercial gain. We maintain a zero-tolerance approach to these practices and we remain committed to acting ethically, transparently and with high integrity in all our business dealings and relationships.

We expect the same high standards from all of our contractors, suppliers and other business associates and we expect them to hold the businesses within their own supply chains to the same high standards.

Our Supply Chain

It is widely acknowledged that the construction industry is a high-risk sector for modern slavery and human trafficking, largely due to the demographics of the temporary labour workforce and complex supply chains.

We aim to ensure that we only work with credible suppliers and contractors so as to limit the potential risk of slavery or human trafficking in our business and supply chain.

Practices

We pay all of our directly employed workers at least the statutory UK National Minimum Wage or the UK National Living Wage (as applicable to the age of the worker).

We take steps to ensure that all our workers are eligible to work in the UK, either as part of our own recruitment process for directly employed workers or via our agency suppliers' processes. We also carry out DBS (Disclosure and Barring Service) checks and PVG (Protecting Vulnerable Groups) checks where statutorily required.

Temporary Workforce

Our temporary site-based workforce is particularly vulnerable to the risk of modern slavery. We continue to be proactive in mitigating this risk by outsourcing the recruitment process of this workforce through a reputable third-party company. All agency suppliers are required to agree to comply with the Act and to give various assurances that their personnel and temporary workers are not victims of slavery or trafficking. Agency suppliers are also required to complete an annual questionnaire relating to obligations under the Act so that any inadequacies can be identified and addressed.

To further strengthen the assurances detailed above, we require the outsourcing partner to undertake audits on our labour suppliers to ensure that they also comply with the Act and pay our workers no less than the statutory UK National Minimum Wage or the UK National Living Wage (as applicable to the age of the worker) and that these pay rates are not reduced by the treatment of travel and/or subsistence expenses. These audits may take the form of an on-site or remote review of the records held by each labour supplier, including sight of workers' payslips, right to work documents and terms of engagement.

Adherence to our values and policies

We expect our employees (whether permanent, fixed-term or temporary), directors, casual and seconded staff, consultants, suppliers and subcontractors to share our own ethics and values by complying with our Anti-Slavery and Human Trafficking Policy, Money Laundering and Terrorist Financing Prevention Policy, and our Anti-Bribery and Corruption and Fraud Policy. We require suppliers and subcontractors to agree to representations and warranties contained in our standard Terms and Conditions, Subcontract Agreements and Framework Agreements relating to the prevention and detection of modern slavery and human trafficking. In addition, we require them to implement due diligence procedures within their own supply chains.

Whistleblowing

In order to detect, report and ultimately prevent modern slavery in any part of our business or supply chain we must encourage those working with, or for us, to raise any concerns or suspicions at the earliest possible stage and without fear of detrimental treatment. To achieve this, employees as well as new suppliers/subcontractors are given guidance on our Whistleblowing Procedure and have access to an external and anonymous 'whistleblowing hotline'.

Grievances or Complaints Received

There were no grievances or complaints related to modern slavery or human trafficking during the financial year end 31 August 2018.

Training and Awareness

We have introduced an ebook "*What is Modern Slavery?*" which is mandatory for all existing and future employees, consultants and temporary non-site-based workers of the Group. We believe that by completing this training employees will gain a wider knowledge of modern slavery and human trafficking and enable them to recognise potential areas of risk within the workplace. We will also be introducing an eLearning module tailored for key employees designed to provide a deeper understanding of modern slavery and human trafficking. Completion of the eLearning modules will be measured as a KPI within the forthcoming financial year.

Future Steps

We aim to align our policies and procedures on modern slavery and human trafficking with best practice and changes in legislation. To that end, we aim to take the following steps during the financial year ending 31 October 2019:

Training – Supply Chain

We aim to introduce training specifically for those employees who have the ability within their job role to identify modern slavery within our supply chain.

Awareness

In order to increase awareness across our business, we will publish articles on modern slavery within staff and homeowner publications.

Site Labour

We recognise that victims of modern slavery within the construction and domestic services sector are often EU migrant workers. An analysis of our temporary labour workforce is being undertaken in light of the potential impact of Brexit. This will also give us the ability to greater assess the potential risk on modern slavery and take proactive action.

Key Performance Indicators

Our KPIs will develop over time and our initial key measures are:

Measuring the number of suppliers and contractors who have received a copy of our modern slavery policy, grievances/complaints received and risk assessments undertaken.

We review our Anti-Slavery and Human Trafficking Policy and other related policies on annual basis.

The Company will achieve our aims as mentioned in the Policy Statement by our initiative to identify and mitigate risk in the following ways:

To mitigate risks we will ensure:

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.).
- Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work;
- We encourage the reporting of concerns and the protection of whistle blowers
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking.

We expect all those in our supply chain and contractors comply with our values.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff.

All Directors have been briefed on the subject.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of Audits by Directors, Managers, and Safety Managers;
- Use of labour monitoring and payroll systems;
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

Chris Graham

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Director – CJ Paint Spraying Ltd

Date – 22/12/2022