

## **MODERN SLAVERY ACT STATEMENT**

### **INTRODUCTION FROM THE BOARD OF DIRECTORS**

We are committed to improving our practices to combat slavery and human trafficking.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced labour and human trafficking, all of which have in common the deprivation of a person's liberty for personal or commercial gain.

Sudlows have a zero-tolerance approach to modern slavery and we are committed to acting ethically, with integrity and ensuring compliance with the UK's Modern Slavery Act 2015. In all our business dealings and relationships, we implement and enforce effective systems and controls to ensure modern slavery is not taking place.

We are also committed to ensuring there is transparency in our own business and expect the same high standards from all of our contractors, suppliers and other business partners.

### **ORGANISATION'S STRUCTURE**

We are an award winning Critical Infrastructure Specialist formed around three core divisions:

- Critical Infrastructures
- Enterprise Services
- Facilities Management

The company was founded in 1912 and has been the provider of choice for M&E and IT Projects for over 100 years. Sudlows Group Limited also comprises of Sudlows Limited and Sudlows Enterprise Services Limited. Our head office is in the United Kingdom. We have over 190 employees and operate in the UK and Dubai.

We have an annual turnover of £25,075,000.

### **OUR SUPPLY CHAINS**

Our supply chains include manufacturers, suppliers, sub-contractors and distributors across the Critical Infrastructure industry.

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we are committed to the prevention, detection and reporting of modern slavery in any part of our business or supply chain. This is the responsibility of all those working for, or on behalf of Sudlows and all are required to avoid any activity that might lead to, or suggest, a breach of our Anti-Slavery Policy.

Everyone working for, or on behalf of Sudlows, are under an obligation to notify their primary Sudlows contact if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. They are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.

It should be noted that, where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

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 their suspicion that modern slavery may be taking place in any part of our own business or in any of our supply chains.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

#### **SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a rigorous supply chain compliance programme. This consists of both audits as well as detailed supplier appraisals and reviews.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal
- Human resources
- Procurement
- Sales

- Health and Safety

## TRAINING

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 our staff.

## FURTHER STEPS

We will continue to review the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains, and we intend to take further steps to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2017.

Signed:



John Collins, Managing Director

Sudlows Group Limited for and on behalf of Sudlows Limited and Sudlows Enterprise Services Limited.

Date: 31.07.2016

Review Date: 31.07.2017