

Slavery and Human Trafficking Policy Statement

Our Structure, our Business and our Supply Chains

Stepnell Holdings Ltd is the lead company of a property development and construction group of companies. This statement relates to all companies within this group, which includes Stepnell Holdings Ltd, Brackley Investments Ltd, Brackley Property Developments Ltd, Stepnell Ltd, George Law Ltd, EvoEnergy Ltd, Whitecross@Stepnell (Holdings) Ltd, and Whitecross@Stepnell Ltd.

Stepnell Holdings Ltd and its subsidiaries operate exclusively in the highly regulated construction sector within the UK. All work is carried out in accordance with UK Government tax regulations and the UK health and safety regime. The Directors believe that this significantly reduces the risk of contravention of the Modern Slavery Act 2015.

Companies within our Group do utilise complex and sophisticated supply chains to provide our service to our customers. Whilst Directors recognise that this can make checking for illegal activity within our supply chain more complicated, there are a number of circumstances that reduce the risk of slavery and human trafficking within our supply chains. These include:

- Our work is not seasonal and does not rely on large numbers of unskilled labour at specific times of the year.
- Our work is generally skilled and requires competent capable skilled operatives who carry validated trade or professional qualifications.
- As a regional operator our subcontractor supply chains are generally relatively short and use established and regular contractors, who also work exclusively within the regulated UK economy.
- Work on our sites is always monitored by our own employees allowing a high degree of control and visibility of our own work.
- The majority of our material supplies that are fitted on our sites are generally sourced through UK distributors or UK companies within our supply chain, allowing strong commercial controls to be applied to encourage compliance with the Modern Slavery Act 2015. Material sourced from outside the UK is rare and the isolated nature of this procurement allows bespoke controls in each instance.

Our relationships with our suppliers are all on commercial arms-length terms, allowing for bespoke terms and validation of compliance with statute. As an established, owner managed, family business, our relationship with our employees allows a high degree of engagement between Directors and all employees. These regular and open relationships allow the best environment to raise concerns of slavery and human trafficking should they occur. Our relationship with trade unions is generally through the industry forums, such as the Construction Industry Joint Council, allowing us to benefit from a strategic collaboration to tackle this issue.

Our Policies in Relation to Slavery and Human Trafficking

Stepnell Holdings Ltd, and all its subsidiary companies comply and will continue to comply with the provisions of the Modern Slavery Act 2015. Our approach has been divided into three specific areas, each with a named individual responsible for monitoring and reporting.

Within our Group Companies

Stepnell Holdings companies will work to promote awareness within employees of modern slavery and human trafficking within the UK construction and development industry. Group Companies will ensure that their employee pay and conditions remain at a high standard, above those dictated by the Act. Any potential contravention will be dealt with seriously and investigated appropriately by the Board of the relevant company, as will any recommendations for improvement within our businesses. Any whistleblowing or complaint by an employee will be supported and investigated through our formal grievance procedure.

Directors believe that the risk of failing to comply with the Modern Slavery Act 2015 within our Group is low, because of the following measures:

- All employees are on full written conditions of employment that are standardised around two models that have been checked for compliance with the Act.
- All employees are paid at or above the "Living Wage".
- No casual labour is entertained within The Group.
- Unpaid work experience or internships are regulated through a standardised risk assessment.
- Appropriate training of relevant staff will be carried out prior to the financial year end.

The Managing Directors of the individual companies within The Group are individually responsible for ensuring compliance with these requirements.

Within our Subcontractor Supply Chain

Stepnell Holdings companies will work to prevent modern slavery and human trafficking within our subcontractor supply chains through reducing the risks and working to influence behaviours within our directly contracted subcontractor organisations. Any failure to address these issues that results in a contravention of the Act, a possible contravention, or a perceived contravention of the Act that could impact the reputation of a Stepnell Holdings company may be investigated and result in a variety of actions, up to and including removal from our supply chain.

Within the current financial year Stepnell Holdings companies will undertake the following activities:

- A review and amendment of standard terms of engagement to incorporate the requirements of the Act and requirements of Stepnell Group companies.
- Publication of an advice note to our core supply chain members on the Act and its implications to working for a Stepnell Holdings company. This will include their responsibilities to their supply chains and the implications to working with Stepnell companies. It will also provide for a reporting structure for any infringement or potential infringement.
- Large companies caught by the Act will be expected to provide their slavery and human trafficking statements for our records and review.
- Training of our commercial employees on the requirements and ethos of the Act and the implications to the engagement of subcontractors.

The Operations/Construction Directors are responsible for compliance with these requirements.

Within our Material Supplier Supply Chain

Stepnell Holdings companies will work to prevent modern slavery and human trafficking within our material supply chains through reducing the risks and working to influence behaviours within our directly contracted supplier organisations. Any failure to address these issues that results in a contravention of the Act, a possible contravention, or a perceived contravention of the Act that could impact the reputation of a Stepnell Holdings company may be investigated and result in a variety of actions, up to and including removal from our supply chain.

Within the current financial year Stepnell Holdings companies will undertake the following activities:

- A review and amendment of standard terms of supply to incorporate the requirements of the Act and requirements of Stepnell Group companies.
- Publication of an advice note to our core supply chain members on the Act and its implications to working for a Stepnell Holdings company. This will include their responsibilities to their supply chains and the implications to working with Stepnell companies. It will also provide for a reporting structure for any infringement or potential infringement.
- Seeking copies of our suppliers' statements on slavery and human trafficking, which will be taken as evidence that the organisation is starting to address this important issue and that in the current year we can assume compliance with the Act.
- Training of appropriate employees on the requirements and ethos of the Act and the implications to the supply of goods to Stepnell Group companies.

The Operations/Construction Directors are responsible for compliance with these issues.

Our Due Diligence Processes in Relation to Slavery and Human Trafficking

Our due diligence processes to control our risks of compliance within our own businesses and their supply chains will be prepared in the current financial year. We are not able to define these now, except at a strategic and general level, as we have training and investigation work to carry out. Whilst Directors believe that Stepnell Holdings companies are generally low risk they require greater clarity from industry experience over the initial months of this Act in order to ensure appropriate due diligence processes.

Risk Assessments for our Businesses and their Supply Chains

Within the current financial year we will carry out a risk assessment of key risks to contravention of the Act within our own businesses, our subcontractor and material supply chain. This will identify the areas of concern and the mitigating acts that we will carry out this year and next to manage this risk as effectively as possible.

These risk assessments will be put together in conjunction with the senior employees as part of the training within our companies and will include those individuals who are responsible for procurement, management and control of our supply chains.

Within the risk assessments we will review the most appropriate form of whistleblowing to ensure that this is condoned and could be a useful way of ensuring compliance.

Measuring the Effectiveness of our Policies

Within the current financial year Directors will determine an appropriate set of benchmarks to ensure that slavery and human trafficking is not taking place in their businesses or supply chains and that where there is an indication that there is a risk that it is investigated and managed. It is anticipated that this will require key performance indicators and we will investigate appropriate metrics.

Training and Capacity Building about Slavery and Human Trafficking Available to our Employees

Information on the Act and supporting information on best practice and definitions will be placed upon the company intranet, where all employees have access.

Company policy, procedures and best practice guides are available on our company intranet.

Training will be provided within the current financial year to all senior employees on the Act, its requirements and the support available. This may be repeated as required.

Signed:



Tom Wakeford
Joint Managing Director

01 January 2019