



# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

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We the Directors of SDC Builders Limited (the "Company") recognise we maintain relationships with many different organisations in our supply chain, as well as employing a large number of staff and utilising the services of agency workers and contractors. In the light of the general law on employment and human rights, and more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine what extent measures already exist and what further measures we may need to put in place to prevent slavery and human trafficking taking place in any part of our business or in our supply chains.

Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking. All of these forms involve the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf. We expect all who have, or seek to have, a business relationship with the Company to familiarise themselves with our anti-slavery values and documentation and to act at all times in a way which is consistent with this.

## ***Our Business Structure***

We have been in operation since the 1970's, based in Bedford, with a core business in construction in the United Kingdom. We have an international supply chain with direct sourcing by employees and indirect sourcing from our contractors. However, predominately our supply chain is sourced from the United Kingdom. Every main project contract is overseen by a Board Director.

We have undertaken a risk assessment and will continue to do so of the supply chains we use in order to ensure we have a consistent approach to the prohibition of Modern Slavery. We ensure our recruitment of staff and contractors is undertaken in a manner consistent with United Kingdom immigration legislation and with the Modern Slavery Act.

## ***Our Anti-Slavery Values***

As part of our culture of good governance, we operate to a set of core values which reflect our relationships with our principal stakeholder groups: clients, consultants, subcontractors, suppliers and employees. Our values for all our business relationships reflect our attitude against the exploitation of individuals in any form and more particularly the offences under the Modern Slavery Act 2015.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

## ***Purpose of this Statement***

This statement demonstrates our commitment to prevent opportunities for modern slavery occurring within our businesses or supply chain. The term "modern slavery" has the meaning given in the Act.

We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We use reasonable endeavours to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.



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## *Steps for the Prevention of Modern Slavery*

1. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect these same high standards from all of our contractors, suppliers and other business partners.
2. We are evolving and updating our contracting processes to include specific questions and disclosure of our suppliers in order that we can do what is reasonable to prohibit the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.
3. All our team members, including employees and contractors are obliged to familiarise themselves with our procedures to help us identify and prevent modern slavery and to ensure that we can conduct business in a manner consistent with the Modern Slavery Act 2015
4. We ensure that we check any recruitment agencies we use and carry out our recruitment process for employees in a transparent manner consistent with the Modern Slavery Act. We adhere to all immigration rules.
5. Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in these chains. We will take reasonable steps to comply with these obligations but are not able to control our suppliers' activities if these are not disclosed to us. However, to underpin our compliance with practical steps, we intend to adopt the following measures:
  - (i) conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
  - (ii) engage with our suppliers to convey our Anti-Slavery Values and to gain an understanding of the measures taken by them to ensure Modern Slavery is not occurring in their businesses, to include requesting suppliers Modern Slavery Act Statements, risk assessments and details on their contractual procedures to prohibit modern slavery in their supply chains;
  - (iii) where appropriate, as part of our risk assessment, tender or contractual processes we may need to introduce additional contractual provisions for our suppliers to confirm their commitment to our anti-slavery values and to accept our right to audit their activities and relationships (where practicable), both routinely and at times of reasonable suspicion.
  - (iv) Provide further training to our staff, particularly those responsible for contracting with our supply chain

## ***Responsibility***

Ultimate responsibility for the prevention of modern slavery rests with the Board of Directors. The Board of Directors has overall responsibility for ensuring this statement and its implementation complies with our legal and ethical obligations.

## ***Actions to Report Modern Slavery or Human Trafficking***

Our Public Interest Disclosure Policy (Whistleblowing Act Policy) is intended to provide guidance on how concerns can be communicated to the Company. If an employee has any concerns regarding suspected modern slavery associated with the Company or our suppliers, they should use the procedure outlined in the Public Interest Disclosure Policy to report it to us.



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In summary, team members should approach either their line manager, equivalent senior leader or Human Resources. If the matter is extremely serious then a director of the Company should be approached. The nature of the complaint will determine the Company's next course of action.

## Safeguards

We aim to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

An employee will be protected from any detrimental treatment if they raise a concern of modern slavery as long as it is done in good faith. Any claims or allegations made which are found to be malicious will result in disciplinary action being taken against the individual.

## Communication and Awareness

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship and reinforced as appropriate thereafter.

## Review

Following its initial adoption, this Modern Slavery and Human Trafficking Statement will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time.

Signed:

**Francis Shiner**  
Managing Director

Signed:

**Adam Knaggs**  
Deputy Managing Director

Signed:

**Martin Lowndes**  
Finance Director

Signed:

**Gary Wykes**  
Director

Signed:

**Dan Changer**  
Director

Signed:

**Andrew Shiner**  
Director

Signed:

**Carl Bennett**  
Director

Signed:

**Andrew Mitchell**  
Director

Date: **September 2020**

Next Review Date: **March 2021**