

# TRANSPARENCY STATEMENT ON MODERN SLAVERY



(in compliance with the Modern Slavery Act 2015)

## Policy Statement

Seddon Group undertakes building, construction and maintenance projects throughout the UK through a number of subsidiary companies namely Seddon Construction, Seddon Developments, Seddon Care Partnerships, Seddon Housing Partnerships and Seddon Homes. We operate in a number of sectors, primarily, housing, education, care, retail and commercial.

Seddon Group is opposed to any form of forced labour including human trafficking and modern slavery and we recognise that we have a responsibility to take a robust approach to modern slavery and human trafficking and are committed to preventing it in our activities and that of our supply chains.

## Supply Chain Structure and Activities

The supply chain that supports our business comprises of a wide range of suppliers and encompasses products and services including suppliers of building products and materials, consultancy services, IT hardware and software, subcontractors providing labour and recruitment agencies providing contingent agency workers and permanent recruitment services.

## Risk Assessment and Due Diligence

As a construction business operating in the UK, the key areas of our business that could be affected by modern slavery are directly hired employees, labour provided by our subcontractors, contingent supplied agency workers on our sites and the workforce of our supply chain who supply materials to our business.

The steps we have taken to mitigate risks in relation to each of these are as follows:-

### Directly Hired Employees

We verify that all directly employed employees have the right to work in the UK before they start work with us and we make all employees aware of their working hours, working time regulations, holiday and leave entitlements and all other entitlements via the employee handbook.

### Contingent Supplied Agency Workers

Seddon Group only procure agency workers from our approved preferred suppliers list. As part of our agency workers becoming an approved supplier to the company, we require those suppliers to ensure their agency workers have the right to work in the UK and that they produce a written statement on their approach to preventing modern slavery and human trafficking.

### Subcontractors

When placing subcontractor orders for use on our sites, our formal subcontract reminds our subcontractors of Seddon Groups commitment to modern slavery and human trafficking.

### Suppliers

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. We procure the majority of our sourced goods, services, products and materials from UK based organisations. Where possible we will procure from suppliers that are required to comply with UK laws on modern slavery. We want all our suppliers to consider the risks of modern slavery in their supply chain.

The above due diligence processes are aimed to:

- Identify risk areas in our business and supply chain.
- Reduce the risk of slavery from occurring.
- Monitor potential risk areas in our business and supply chain.

### **Policies**

The following policies have been reviewed and updated to describe our approach to modern slavery:-

**Whistleblowing Policy** – updated to allow any employee or third party to confidentially raise a concern regarding modern slavery and human trafficking.

**Recruitment Policy** – to include provision of our commitment to the Modern Slavery Act 2015.

**Agency Workers Policy** – When procuring agency workers we only use agency suppliers that undertake rigorous checks on each individual including; eligibility to work, references, qualifications, and proof of National Insurance (UK).

### **Ongoing Review**

Seddon Group recognises that compliance to the Modern Slavery Act 2015 will be an evolving process. Therefore, the contents of this statement will be reviewed and updated on an ongoing basis.

### **Responsibility**

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Jonathan Seddon

Chief Executive Officer

Seddon Group Ltd