

## **Introduction**

Modern slavery is a criminal offence and can occur in various forms including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This document sets out the Company's policy with the aim of prevention of opportunities for modern slavery to occur within its business or supply chain. The Company is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, the Company is committed to creating and ensuring a non-discriminatory and respectful working environment for its employees.

The Company recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion once in our employment.

## **Our Business**

Founded in 1964, I & H Brown is a medium sized family-owned business that employs over 200 people. Our approach is to take a long-term strategic view and to encourage growth through the reinvestment of our profits.

We believe that our greatest strengths are our flexibility, our diversity and above all our client focus. Our core business remains civil engineering with further interests across development, estates, farming and renewable energy. This diverse portfolio of activities provides us with resilience and financial stability.

We value our people because we recognise that our business depends on committed individuals who share the company's ethos and objectives. We invest in training and personal development and we encourage staff to take responsibility and to show initiative.

All our employees have a contract of employment. The contract sets out working conditions, hours of work, holiday entitlement etc. We are also an accredited employer under the Real Living Wage Foundation which ensures our employees are paid the Living Wage or higher.

## **Relevant Policies on Modern Slavery**

- Anti-Fraud and Bribery Policy
- Anti-Slavery and Human Trafficking Policy
- Corporate Responsibility and Sustainability Policy
- Equality, Diversity and Inclusion Policy
- Ethical Business Policy

## **Supply Chain Due Diligence**

Our supply chain consists of suppliers and subcontractors who are well established within the construction sector. We are therefore confident in their ability to comply with requirements of the Modern Slavery Act 2015. Additionally, much of our supply chain will be legally required to produce their own modern slavery statements.

Our operations mean that we have no direct contact with countries that are generally regarded as being the most likely to have a risk of modern slavery and human trafficking as noted in the Global Slavery Index.

In 2021/2022 further scrutiny of our supply chain shall take place as described below in proposed actions.

### **Progress in 2020/2021**

During the financial year ending 29 August 2021 the Company has undertaken the following activities.

- Ensured that consideration of the modern slavery risks and prevention are added to the Company's policy review process as an employer and procurer of goods and service.
- Continued to ensure all labour agency suppliers' procedures to ensure correct right to work checks are in place.
- Continued to develop an employee awareness strategy for the Modern Slavery Act 2015 and reporting mechanisms if a case of slavery or human trafficking is suspected.
- Completion of Clients modern slavery questionnaires
- A Real Living Wage clause has now been included in all of our future sub-contract and purchase orders. This requires that the Real Living Wage is paid to employees of the subcontractor and its' supply chain.

### **Proposed Goals and Actions for 2021/2022**

We shall sign up to the Gangmasters and Labour Abuse Authority (GLAA) Construction Protocol. This will allow the Company to participate in information sharing and best practice.

#### Training

We will increase staff awareness of the issues of modern slavery and how any concerns can be reported by promoting the use of the Gangmasters and Labour Abuse Authority (GLAA) construction protocol induction pack.

- Site induction updated with GLAA induction slides
- GLAA 'Are You Alright' posters to be placed on noticeboard in canteen with details of how to report or seek advice. Posters are available in a number of languages if required.
- Roll out of GLAA toolbox talk to sites
- Implement Mentor courses for further employee awareness

#### Supply Chain

The Company's zero-tolerance approach to modern slavery shall be communicated to all suppliers, subcontractors and business partners in all orders placed and reinforced as projects commence.

For our supply chain we shall identify their main country of origin/operations; UK, EU or outside of EU. This will allow the company to prioritise our sites and our subcontractors, ensuring training and oversight is effectively prioritised.

We will issue a questionnaire on modern slavery to a number of our suppliers and subcontractors.

We expect our supply chain to meet the same minimum standards as described in this statement. To achieve this, we will update our subcontract order to include a modern slavery clause which states that the subcontractor must ensure that no slavery or human trafficking takes place within its' own business or its' own supply chain.

### **Governance**

Ultimate responsibility for the prevention of modern slavery rests with the Main Board who have overall responsibility for ensuring our Anti-Slavery and Human Trafficking Policy and its implementation comply with our legal and ethical obligations.

### **Review and Sign off**

This Modern Slavery Transparency Statement has been reviewed and signed off by the Board of Directors.

Name: J Scott Brown

Signed:

Position: Managing Director

Date: 25/05/2022