

Modern Slavery and Human Trafficking Statement

This statement has been produced in accordance with Section 54(1) of the Modern Slavery Act 2015. It states the actions Gratte Brothers Group Limited has taken during the financial year ending 31 March 2023 with the aim of ensuring that modern slavery or human trafficking is not taking place within our business or within our supply chain.

Organisation Structure

Gratte Brothers Group is an independent, family-owned building services company which provides electrical, mechanical, security and commercial catering facility services through the following operating companies; **Gratte Brothers Limited, Gratte Brothers Building Services Maintenance Limited, Gratte Brothers Security Management Limited, Gratte Brothers Catering Equipment Limited and Gratte Brothers Technical Services Limited.**

The Group operates from Head Office (London) and 5 branch offices (Belfast, Chelmsford, Stevenage, Warrington and Worthing) as well as multiple sites across the United Kingdom and Ireland.

Policy in Relation to Modern Slavery & Human Trafficking

The Company has a zero tolerance approach to all forms of modern slavery and human trafficking including child labour within its business and supply chain and is committed to acting ethically and with integrity in all business dealings. Gratte Brothers is also committed to freedom of association and this is supported by our Ethical and Sustainable Procurement Policy.

Gratte Brothers respects all human rights, including the Universal Declaration of Human Rights and therefore ensures minimum wages, hours and benefits for all of its employees and supply chain in order to meet or exceed all local human rights legislation. These commitments ensure all of the Company's employees and sub contractors are engaging in freely chosen employment.

Where staff have concerns around issues of human rights, forced labour, recruitment practices or exploitations, they are encouraged to report these concerns to management or alternatively staff can contact an independent 24-hour confidential helpline **0800 350 5182** offered by Health Assured.

Due Diligence

The Company's primary area of risk is within its supply chain. The Company's supply chain consists of material and plant equipment suppliers, professional service providers, recruitment and labour agencies and trade sub-contractors. The Company's aim is always to seek transparency within the arrangements it makes for labour employment and the sourcing of materials.

The Company's labour force consists of permanent employees, agency workers and trade sub-contractors. The Company is a registered member of the JIB (Electrical), BESA (Mechanical) and JIB PMES (Plumbing) organisations and complies with and ensures that labour supply agencies and labour only sub-contractors comply with the respective National Working Agreements. The Company also works with the Unite Union on labour relations.

Supply Chain

As part of the Company's supply chain approval process for new trade contractors and/or suppliers, a pre-qualification questionnaire (PQQ) is issued where aspects of social and ethical values, including slavery and human trafficking, are examined. The completion of this questionnaire allows the Company to identify potential risk areas within the supply chain. For existing trade contractor/suppliers a 2 year re-approval process is in place.

Scheduled 2nd party supplier audits take place, along with regular individual engagement meetings and group forums with supply chain members.

Recruitment

The HR Department has in place a Preferred Supplier List (PSL) of agencies offering labour supply and recruitment services which is reviewed on an annual basis. The Company carries out compliance audits of recruitment agency practices covering organisational structure, accreditations, right to work checks, modern slavery, anti-corruption, minimum wage, wage calculations, occupational health and pension arrangements.

Assessment of Risk

The Company has mapped out our supply chain of goods and services to identify elements of works and materials/products that are sourced from outside the UK and Western Europe, especially high-risk countries as detailed within the Modern Slavery Index, as these suppliers may represent the highest level of risk to the Company.

Members of our HR, Procurement and Operations Teams have received specialist training on preventing and tackling modern slavery to assist in identifying where potential

high risk companies may be engaged.

This external training is delivered by Stronger Together (www.stronger2gether.org) via either external workshops or internal training days and raises awareness of how to spot signs of modern slavery and how to approach modern slavery in supply chains.

The Company has a Risk Director to oversee and manage the level of risk exposure to the Company.

Steps Taken to Date

The Company registered and completed a self-assessment using the Supplier Ethical Data Exchange (SEDEX) to identify and mitigate the risks of slavery and human trafficking.

Relevant staff from across the business have undertaken training relating to Modern Slavery. This included staff from operational activities as well as relevant Group support functions with influence on the supply chain and labour throughout the business.

Modern slavery questions were added to the Company's audit matrix checklist for supply chain members and an audit programme was introduced to include second party audits of our Tier 1 trade contractors and PSL labour supply agencies.

The Company has appointed an external verification specialist to undertake the supply chain approval process using the Common Assessment Standard (CAS). This assessment includes questions on corporate social responsibility covering modern slavery.

The Company has carried out risk assessments on contractors based on their size, nature of work and amount of work carried out for Gratte Brothers, which will be used to identify key audit targets in the coming year.

The Company has an Ethical & Sustainable Procurement Policy which is reviewed annually and sets criteria for carrying out procurement activities.

The Company has worked with an external training provider to develop an eLearning module on modern slavery, which has been approved by the HR department.

Future Plans

The Company plans to continue to manage the risk of modern slavery through the following activities:

- The Company will increase the number of Tier 1 supply chain and PSL labour supply chain audits undertaken across the Group.
- The Company will roll out a mandatory modern slavery eLearning module for existing and new staff and make it part of the ongoing compliance series of modules.
- The Company will develop and implement an updated Whistle-blowing Policy including guidance on how to report concerns regarding modern slavery.
- The Company will present modern slavery posters and appropriate information on all of its sites as well as the Company's Intranet.

Training & Awareness

To minimise the risk of modern slavery within our business and our supply chain, specialist training has been provided to appropriate procurement, HR and operational staff. This continues to be reviewed and updated as required.

Modern slavery content has been added to the Company Induction Process, undertaken by all new starters within the business.

This statement has been approved by the Gratte Brothers Group Board and applies to all companies within the Group.



Signed:

D Gratte
Group Managing Director
14 September 2023