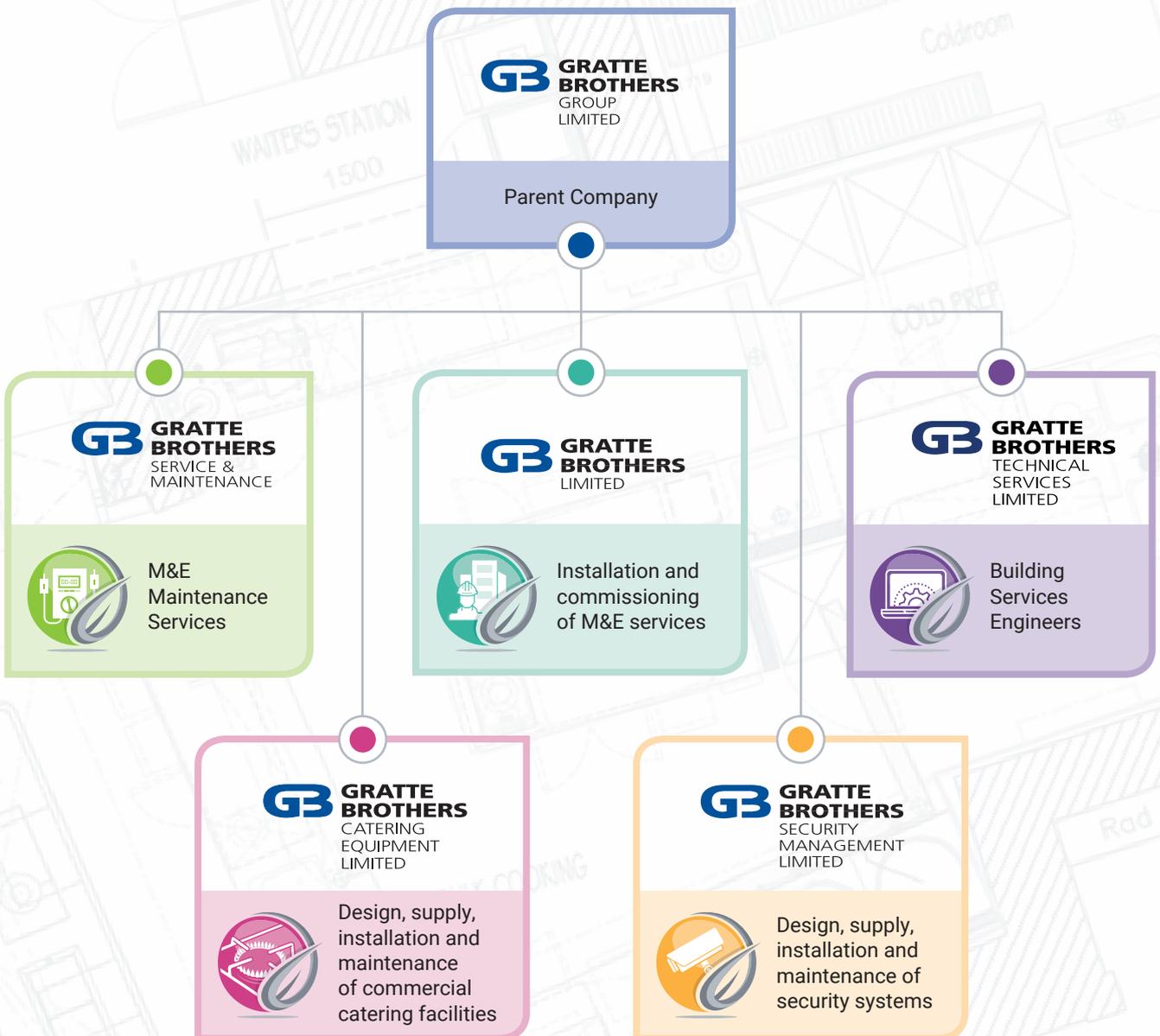


Modern Slavery & Human Trafficking Policy

This statement has been produced pursuant to Section 54(1) of the Modern Slavery Act 2015. It states the actions the Group has taken during the financial year ending March 2018 to ensure modern slavery and human trafficking is not taking place in its operations and supply chain.

OUR BUSINESS

Gratte Brothers Group is a family owned building services company providing from one source a complete range of electrical, mechanical, security and commercial catering facility services. The Group is made up of Gratte Brothers Limited, Gratte Brothers Specialist Services Limited, Gratte Brothers Security Management Limited, Gratte Brothers Catering Equipment Limited and Gratte Brothers Technical Services Limited (as detailed below).



The Group operates from head office (London) and 5 branch offices (Belfast, Crawley, Stevenage, Warrington and Worthing) as well as multiple sites across the United Kingdom and Ireland. The Group turnover exceeds the £36 million threshold for this financial year.

The company's supply chain is made up of material and plant suppliers, professional service providers, recruitment and labour agencies and trade sub-contractors.

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 National Working Agreements. The company also works with the Unite Union on labour relations.

POLICY

The company has a zero tolerance approach to all forms of modern slavery and human trafficking within its business and supply chain and is committed to acting ethically and with integrity in all business dealings.

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

Upon a claim of believed slavery and/or human trafficking being disclosed, the company will investigate the allegation and in the event of it being proven, will notify the relevant authorities while, as far as is practicable, providing support to the victim(s).

DUE DILIGENCE

As part of the company's supply chain approval process, a pre-qualification questionnaire is issued where aspects of the supplier/sub-contractors' social and ethical values, including anti-slavery and human trafficking, are examined. The completion of this questionnaire allows the company to identify potential risk areas within the supply chain.

The Human Resources department has in place a preferred supplier list (PSL) of agencies offering recruitment services which is reviewed on an annual basis.

RISK ASSESSMENT

The company has mapped out our supply chain of goods and services to identify elements of works and materials/products that are derived from outside the UK and Western Europe, especially high risk countries as detailed within the Modern Slavery Index, and is concentrating on these suppliers first, as they represent the highest level of risk to the company.

2018 PROGRESS

To identify and mitigate the risks of slavery and human trafficking, the company has registered and completed a self-assessment using the Supplier Ethical Data Exchange (SEDEX). This tool assesses the company against a number of categories including labour standards, health and safety, environmental and business ethics.

Four members of our Human Resources and Sustainability departments have attended specialist modern slavery awareness workshops by Stronger Together, a multi-stakeholder business-led initiative aiming to reduce modern slavery.

Further Modern slavery questions have been added to the company's audit matrix checklist for supply chain members.

PLANS FOR 2019

Members of our procurement and supply chain department will attend the Stronger Together modern slavery awareness workshops.

The company will introduce a new audit programme of our supply chain by introducing second party audits of our Tier 1 sub-contractors and PSL labour agencies.

The company will develop and introduce in-house modern slavery awareness training courses around illegal working, slavery and forced labour. Initially, this focuses on our site teams where the potential to witness modern slavery is greatest.

AWARENESS ACROSS THE BUSINESS

As part of its inductions to new staff members and agents, the company will give guidance on identifying risk areas within its supply chain in regard to slavery and human trafficking. Refresher guidance will be given to existing staff members and suppliers as necessary.

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



D Gratte
Group Director
29 March 2019