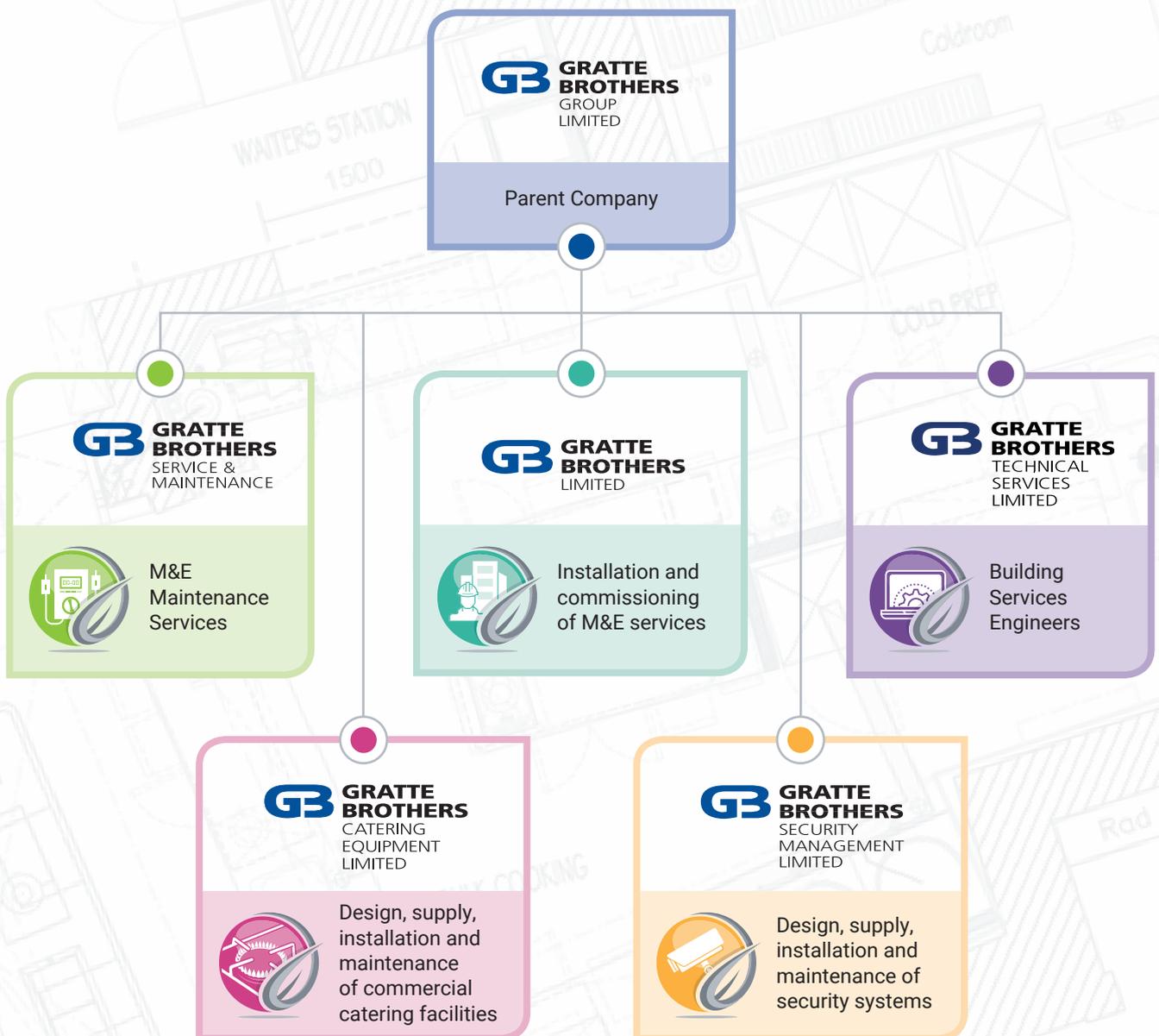


Modern Slavery & Human Trafficking Policy

This statement has been produced in accordance with Section 54(1) of the Modern Slavery Act 2015. It states the actions the Group has taken during the financial year ending 31 March 2019 to ensure modern slavery and human trafficking is not taking place in its operations and supply chain.

OUR BUSINESS AND SUPPLY CHAIN

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. This is supported by our Ethical and Sustainable Procurement Policy.

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 free 24 hour 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

Supply Chain

As part of the company's supply chain approval process for new trade contractors/suppliers, a pre-qualification questionnaire 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 with supply chain members.

Recruitment

The Human Resources 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.

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.

Members of our HR, Procurement and Operations departments have received specialist training on preventing and tackling modern slavery to identify where potential high risk companies may be engaged. This training was delivered by Stronger Together (www.stronger2gether.org) and raises awareness of how to spot signs of modern slavery and how to approach modern slavery in supply chains.

The company has appointed a Risk Manager to oversee and manage the level of risk exposure to the company.

PROGRESS TO DATE

In 2017/18 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. This tool assesses the company against a number of categories including labour standards, health and safety, environmental and business ethics.

The company's Group Sustainability Manager attended a Modern Slavery awareness workshop delivered by Stronger Together.

In 2018/19 three members of the Human Resources department attended a Stronger Together Modern Slavery awareness workshop.

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.

FUTURE PLANS

A one day in-house training course will be delivered by Stronger Together to be attended by representatives of all operating companies within the Group as well as Procurement, HR, Facilities and Senior Management.

The company will review our supply chain audit programme to increase the number of audits carried out, the scope of the audit checklist and to include recruitment agencies, manufacturers and service providers.

The company will develop and introduce in-house modern slavery awareness tool box talks covering illegal working, slavery and forced labour. Initially, this will be delivered to our site teams including our supply chain sub-contractors as this is where the potential to witness modern slavery is greatest.

The supply chain department will investigate the possibility of outsourcing the approval process to an external verification specialist.

An updated whistle-blowing policy including guidance on how to report concerns regarding modern slavery will be developed and implemented.

AWARENESS ACROSS THE BUSINESS

As part of a review of the company's induction process for new staff members, the HR induction has been redesigned to include awareness of the company's commitment to ensure that modern slavery is not taking place within its operations and supply chain, including what steps are being taken and guidance on identifying risk areas in regard to slavery and human trafficking. Guidance will be given to existing staff members and suppliers through tool box talks and refresher training 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
20 September 2019