

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

## Introduction

This statement sets out the approach Kilnbridge has taken to date and the actions we intend to take throughout our financial year for 2022-2023, with the aim of ensuring that modern slavery and human trafficking does not take place either within the business or our supply chain.

## Statement of Commitment

Kilnbridge is committed to ensuring that there is no modern slavery or human trafficking in any part of its business. This statement applies to all persons who act on our behalf in any capacity, including employees at all levels: directors, consultants, contractors, agency workers, and our supply chain.

Kilnbridge acknowledges its responsibility under the Modern Slavery Act 2015 ("the Act") and will ensure transparency is achieved within the organisation so the objectives of the Act are achieved on a consistent basis.

The below sets out practices that are already in place and any committed actions set for 2022/23, in response to the regulatory requirement of the Modern Slavery Act.

## Our Organisation

Kilnbridge is a multi-disciplined Building and Civil Engineering organisation which operates across a range of sectors and services and, as such, we strive to set the highest possible standards. We uphold our set of values and steer all of our activities towards excellence.

The Company operates predominantly in the UK, with most of our work taking place in and around London and the Home Counties but do travel nationally.

Our primary area of risk is within the supply chain structure relating to the sourcing of labour and materials. Our Company's supply chain is predominately UK and EU based; however, it also procures some products from Asia.

Kilnbridge works alongside partners such as GLAA, Supply Chain Sustainability School, and Sedex to help implement our approach to preventing modern slavery.

## Our Policies in relation to Slavery and Human Trafficking

Kilnbridge is committed to acquiring goods and services for its use without causing harm to others. Kilnbridge will make reasonable endeavours to ensure all employees and agents within our supply chains are not subject to any form of forced, compulsory/bonded labour or human trafficking and that they are paid in line with the national minimum wage.

The CEO and Board of Directors have full responsibility in ensuring that the following Policies are enforced within the organisation and for ensuring all members of staff have a personal responsibility for the successful prevention of slavery and human trafficking. The following Kilnbridge Policies support the organisation's compliance with the Act:

- POL 007 KGL Equality, Diversity and Inclusion Policy
- POL 018 KGL Responsible Procurement Policy
- POL 019 KGL Anti-Slavery & Human Trafficking Policy

## **Due Diligence**

The Global Slavery Index provides significant evidence that labour standard risks are present in the construction industry and within the production of construction materials. To help identify and mitigate the risks of slavery and human trafficking Kilnbridge undertakes a pre-qualifying questionnaire within its supply chain, which allows an opportunity for vetting of activities and policies.

## **Our High-Risk Areas**

We acknowledge that risks arising from modern slavery and human trafficking can apply anywhere within our operations and supply chain whether through the supply of materials, direct employment or sub-contracted employees. We feel there is an element of risk in Recruitment when using Agencies and have therefore set up a preferred supplier list whereby nobody within the business can go to any Agencies that have not been approved to our Preferred Supplier list. As per our main supply chain companies, all go through a very strict vetting process before they can work on our construction sites, they sign up to our code of conduct whereby they agree to paying their operatives/management staff at least the national minimum wage / national living wage and ensures they continue to have freedom of employment. We expect our suppliers and subcontractors to ensure there is no slavery or human trafficking in their supply chain and we conduct regular reviews to ensure their compliance.

## **Training and Raising Awareness of Modern Slavery and Human Trafficking Issues**

The following training has been provided within the business:

All procurement staff, along with a majority of HSEQ and HR, have completed an on-line Modern Slavery and Human Trafficking training via the Supply Chain Sustainability School. Furthermore, in 2022 the Company launched a new Onboarding Induction programme, which ensures all new staff complete an online training session regarding modern slavery as part of our mandatory onboarding process.

## **Plan for continual improvement**

It is the Company's intention to:

- Nominate a director to oversee Kilnbridge's approach to modern slavery.
- Nominate a responsible individual in each business unit with the goal of forming a joint working group led by the business' lead on modern slavery.
- Host a toolbox talk outlining the signs of modern slavery and the correct process of reporting said concerns.
- Increase our roll-out of posters and literature on modern slavery to all sites where KCSL staff are operating.
- Open an internal reporting email to supplement the national helplines in reporting any modern slavery concerns.
- Conduct a regular review of all Recruitment Agencies Kilnbridge engage with to ensure they continue to meet the expected requirements.
- Conduct an internal audit on all internal policies and procedures to identify any areas we can further develop ourselves.
- Conduct a regular review of our supply chain to ensure they continue to comply with the agreed supplier agreement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Modern Slavery and Human Trafficking statement for the financial year ending 30 June 2021.



**Dermot McDermott**  
**Chief Executive Officer**