

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

Kilnbridge is a multi-disciplined Building and Civil Engineering organisation which operates across a range of sectors and services in the UK. Most of our work is centred in and around London, the Home Counties, South East, South West and the West Midlands.

This statement sets out the approach Kilnbridge Group Ltd and its subsidiary companies, specifically Kilnbridge Construction Services Ltd, have taken to date and the actions we intend to take throughout our financial year for 2023-2024.

Scope

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 those in our supply chain.

Our Commitment

Kilnbridge is committed to acquiring goods, services and labour without causing harm or duress to others. Kilnbridge makes all reasonable endeavours to ensure our employees, affiliates and agents within our supply chain are not subject to any form of forced, compulsory/bonded labour or human trafficking and that they are paid at or above the national minimum wage if based in the UK.

We acknowledge our responsibility under the Modern Slavery Act 2015 ("the Act") and work to ensure that our operations and our ways of doing business align with the objectives and spirit of the Act.

The CEO and Board of Directors have full responsibility for ensuring that all members of staff understand their personal responsibility in preventing slavery and human trafficking in our organisation and for ensuring that the Policies listed at the end of this statement are enforced.

Modern Slavery Risk Assessment

We acknowledge that opportunities for slavery and human trafficking could happen almost anywhere within our operations but we have identified our primary areas of risk as being:

1. within our supply chain, which is predominantly UK and EU-based but may themselves purchase goods and services from other parts of the work and
2. in our workforce (whether directly engaged or sub-contracted), particularly those doing peripatetic, short-term, blue-collar roles.

Addressing Modern Slavery in Kilnbridge

We have a multi-faceted approach to addressing and ameliorating the risks of Modern Slavery in our business. A number of activities have been completed this year, including:

- quarterly Board reviews of our risk register to ensure amongst other things, that Modern Slavery risks are visible and activities to ameliorate the risks are monitored and supported at the highest level
- the launch of a revised Onboarding and Induction programme, which ensured all new staff completed a mandatory module around Modern Slavery
- running a SCSS Modern Slavery virtual training session for 3 hours in October 2023 with a further session booked for February 2024

- marking Anti-Slavery Week in October which included utilising our internal intranet platform, external social media platforms and multi-language posters on site to communicate key messages to build our workforce's understanding of modern slavery, help them spot the signs and raise awareness of what they should do if they had concerns. We have plans to refresh all our internal activities quarterly
- running Toolbox Talks on our sites to raise awareness of this issue
- ongoing checking of certain informational changes such as bank account and home address for our blue collar population
- conducting a full review of how we secure, use and monitor temporary labour on site by:
 - implementing a smaller, controlled preferred supplier list (PSL) who are vetted annually
 - requiring the PSL to sign up to our code of conduct whereby they commit to paying their operatives/management staff at least the national minimum wage (or ideally the national living wage) and provide assurances that they have freedom of employment
 - introducing strict controls as to who can engage with the PSL and authorise temporary agency labour on site. All agency labour is monitored to ensure compliance with the Agency Worker Regulations 2010 and spot checks are done on payslips to ensure that the rates agreed for operatives are being paid by the agency.

In addition:

- we are signatories to the Gangmasters & Labour Abuse Authority (GLAA) construction protocol and we work alongside partners such as GLAA, Supply Chain Sustainability School and Sedex to support the measures we are taking to prevent modern slavery in our business
- the following Policies support Kilnbridge's obligations under the Act and are available for all to view on our Sharepoint portal:
 - POL 018 KGL Responsible Procurement Policy
 - POL 019 KGL Anti-Slavery & Human Trafficking Policy
 - POL 007 KGL Equality, Diversity and Inclusion Policy

Plans for Ongoing Improvements

We will:

- continue to collaborate with smaller sub-contractors in our supply chain to share resources eg Supply Chain School to promote awareness and compliance with the Act
- promote our Whistleblowing hotline so that anyone with genuine concerns around Modern Slavery (or other wrongdoing) can raise them confidentially, knowing their concerns will be acted upon
- undertake an audit in line with the UK Government's Modern Slavery Assessment Tool in instances where we identify a heightened risk of slavery in our supply chain.

About this policy statement

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 2024.

Dermot McDermott
Chief Executive Officer