



MODERN SLAVERY & ANTI-HUMAN TRAFFICKING POLICY AND DISCLOSURE STATEMENT

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Modern slavery, human trafficking and all related activities which involve the deprivation of a person’s liberty in order to exploit them for personal or commercial gain are crimes and constitute a violation of fundamental human rights. HE Simm is committed to acting ethically, honestly and with integrity to ensure everyone is treated with dignity and respect. HE Simm has continued to take action to ensure there is no modern slavery, human trafficking or related activities taking place anywhere within its business or supply chain. This statement represents the policy of HE Simm regarding modern slavery and human trafficking, in line with the disclosure requirements of the Modern Slavery Act 2015, the steps we have taken and those which will continue to take.

HE Simm & Son Ltd is a privately owned, family business, directly employing 286* people with a turnover of £98million (FY18/19), supplying complete building services packages, specialising in the design, build and maintenance of highly efficient mechanical, electrical and public health systems in the UK. Our integrated supply chain is a strategic business asset crucial to our success. We strive to develop exceptional relationships and work in collaboration with consistently high-performing supply chain partners who share our vision and values to identify and mitigate human rights abuses.

We acknowledge that the structure and success of the business is reliant on the use of competent labour, either employed directly, through our sub-contract supply chain or our goods and materials supply chain. In this respect, we understand that there is risk that modern slavery may take place. As a part of our commitment to identify and mitigate these risks, we have the following arrangements in place:

- | Employment eligibility checks on all directly employed personnel, contractors & subcontractors
- | Our Supply Chain Charter, which aims to create a consolidated supply chain, ensures we only work with sub-contractors and suppliers who aspire to the same standards

- | Completion of robust due diligence checks on all sub-contractors and suppliers, including completion and assessment of pre-qualification questionnaires, submission of a formal declaration of workforce eligibility and completion of verification audits
- | Ongoing checks of the eligibility of all site-based workforce
- | Supporting policies including “Anti-bribery and Corruption” and “Whistleblowing”. HE Simm will communicate this policy to all stakeholders via appropriate means

All supply chain providers will be expected to acknowledge this policy and provide evidence, as necessary, to verify they operate to the same standards. As part of the communication of this policy, all stakeholders will be encouraged to report any genuine concerns about any activities which may be connected to modern slavery or human trafficking. All reports will be handled in absolute confidence and those raising any genuine concerns will be fully supported, in line with the principles of this policy and our Whistleblowing Policy. No-one will be subject to any repercussions or detrimental treatment, even if their concerns prove to be mistaken.

Modern Slavery Helpline
 can be contacted on
08000 121 700

OVER THE LAST 12 MONTHS WE HAVE:

- | Completed due diligence checks on all employees
- | Included an introduction to modern slavery in our induction procedure for all new employees
- | Engaged with the SCSS – running workshops for our senior managers and establishing logins for all colleagues to engage in appropriate e-learning and provide facility for monitoring and recording
- | Supply chain engagement with SCSS and appropriate training
- | We have embedded Modern slavery in the PQQ process
- | We have commenced supply chain mapping. In its infancy but mapping associated with risk, through level of spend and high-risk sectors and countries
- | We have used approved labour agency only when essential

OVER THE COMING 12 MONTHS WE WILL:

2019 KPI'S

- | Ensure 100% colleagues, contractors and sub-contractors have as a minimum completed e-learning module on 'Modern Slavery', by end of 2019
- | Toolbox talks produced and rolled out across all sites – 100% by end 2019
- | Poster campaign throughout our offices and sites, highlighting the importance of reporting any suspected cases of modern slavery, by May 2019
- | Pulse magazine article June 2019
- | Encourage all colleagues to download the 'Unseen' App
- | Continue supply-chain mapping and monitoring level of risk and highlighting these, this is an ongoing work in progress
- | Continue to engage our supply chain in all relevant training and complete all due diligence. We will only engage with supply chain members who have completed any relevant training and demonstrate commitment
- | Additional support for mental health first aiders and training in managing a grievance process

HE Simm will provide additional resource and training where necessary to ensure those with direct responsibilities for fulfilling the arrangements within this policy have the appropriate competence to do so.

GRIEVANCE AND REMEDIATION

All reports will be handled with complete confidence and reported to the appropriate authority immediately. For emergency situations, the emergency services will be contacted via 999, for non-urgent or suspected cases the **Modern Slavery Helpline** will be contacted on **08000 121 700**, the police on 101 or the **whistleblowing helpline** on **0151 707 3222** (whistle blowing officer John Lennie).

This policy and the associated arrangements are valid for the current financial year and will be subject to formal review periodically to ensure continued effectiveness and suitability.

GARETH SIMM
 Managing Director

JOE CARNEY
 HR Director

22 MARCH 2019