

## Modern Slavery Act 2015

### Modern slavery and human trafficking statement

#### Introduction from City Building Services (NE) LTD

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes City Building Services (NE) LTD's slavery and human trafficking statement for the financial year ending 20/21.**

#### Organisational structure

We are a provider of construction and maintenance services in the private sector. We operate throughout north east England and have a head office based in Sunderland, Tyne and Wear. City Building Services (NE) LTD have been operational since 2012 and have achieved an array of industry certifications and accreditations.

City Building Services (NE) LTD currently have 10 employees working throughout our various departments. The company hierarchy includes 1 director with additional minor shareholders.

City Building Services (NE) LTD does NOT operate as a subsidiary and exists solely as a private limited company.

We have an estimated global annual turnover of £700,000.

#### Our supply chains

Our supply chains include various national builders' merchants including Jewson, Howdens, Benchmarx, Travis Perkins, Crosslings. Whenever a new supplier is chosen, we perform a vetting process inline with our internal procedure to approve new suppliers as ethical and suitable. We maintain a register of approved suppliers and add new vendors once we have reviewed their policies, ethical procurement accreditation and supply chain.

Additional suppliers include van rental services, machinery hire services, cleaning services and waste removal services. These companies will go through the same vetting procedure as any other new member of our supply chain before being engaged.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light]

## Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have put in place a designated Modern Slavery and Human Trafficking Policy and we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our Modern Slavery and Human Trafficking Policy and our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

A copy of our modern slavery and human trafficking policy can be made available on request via our head office.

Policies we utilize include:

1. Anti-slavery and human trafficking policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

## Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have implemented a supplier vetting and approval procedure and approved supplier register to ensure all members of our supply chain comply with the Modern Slaver Act 2015.

During this vetting procedure we carefully review all company accreditations, procurement policy, modern slavery and human trafficking policy, sustainability accreditations along with checks on insurance, financial and QMS implementation.

This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery (and on-site audits which include a review of working conditions). Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

## Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain approval programme.

This program asks potential suppliers to submit their Modern Slavery and Human Trafficking policy and procedures for our evaluation and approval.

Compliance is monitored by the relevant appointed employees. The construction manager is responsible for monitoring the procurement network, ensuring all materials are purchased from approved suppliers. The office manager is responsible for evaluating and approving potential suppliers and ensuring their policies and procedures for combating modern slavery and human trafficking are up to date and effective.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers. We regularly conduct training for our procurement/buying teams and general operatives so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

## Our effectiveness in combating slavery and human trafficking

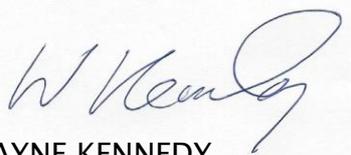
A KPI file is maintained for modern slavery and human trafficking reports or incidents. However, we have never received a report or incident to date.

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

City Building Services (NE) LTD is committed to its obligation to monitor and report suspected modern slavery and human trafficking and we will endeavor to review our statement/policy/procedure if we feel it can be improved.

SIGNED:



NAME: WAYNE KENNEDY

POSITION: DIRECTOR

DATE: 18/01/2021