

SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION FROM THE MANAGING DIRECTOR

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

ORGANISATION'S STRUCTURE

We are a provider to social housing clients and our specialisms are disabled adaptation. Our annual turnover is circa £4m.

OUR BUSINESS

Our business is solely owned by Paul Kelly for delivery of products to the disabled and vulnerable customers within social housing the geographical area we work within are London and the surrounding area.

OUR SUPPLY CHAINS

Given the nature of our business operations we do not believe that we are greatly exposed to the risk of inadvertently becoming involved in slavery and human trafficking. However, to continue to guard against this, as our business evolves, we will routinely review our existing purchasing, due diligence and employment processes with regards to the requirements of the Modern Slavery Act 2015. This will determine associated risk, detection and prevention of modern day slavery and human trafficking within our supply chain for products and services to the organisation.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

The Company operate the following policies which describe our approach to the identification of modern slavery risks and the steps to be taken to prevent slavery and human trafficking in our operations:

- ✓ **Whistleblowing policy:** The Company encourages all staff, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form.
- ✓ **Employee code of conduct:** The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- ✓ **Supplier code of conduct:** The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship. Any supplier found in breach of the code of conduct in relation to slavery and human trafficking will be requested to stop the procedure immediately. Failure to do so will result in immediate termination of supply of goods to SPOT.
- ✓ **Corporate Social Responsibility:** The Company recognises that good CSR encompasses all aspects of sustainable development and the way we affect people through our business operations. The CSR strategy covers: ethical trading, human rights, corporate responsibility and environmental responsibility.

- ✓ **Ethical Strategy:** The Company approach to purchasing has a direct on the lives of people all over the world and we are therefore committed to doing business in a way which ensure that everyone in our supply chains benefits from trading with us.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Euro Contracts acknowledges its responsibility under the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

We will not forge commercial relationships with any business knowingly involved with slavery or human trafficking.

We will expect all who have, or seek a commercial relationship with ourselves, to familiarise themselves with The Modern Slavery Act and our anti-slavery aim and act consistently within these.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values. The Tenancy, Commercial and Retail Directors are responsible for compliance in their respective departments and for their supplier relationships.

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 relevant members of staff. All Directors have been briefed on the subject.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- ✓ Completion of House Audits by Managers and Business Managers;
- ✓ Use of labour monitoring and payroll systems; and
- ✓ Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.



Paul Kelly

Managing Director

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