



# **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

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Revision 2.0



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## **Introduction**

Avonside Group Services is proud of its ethical standards and values and we believe these underpin the aims of the Modern Slavery Act 2015.

In the light of the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our Group businesses or in our supply chains.

This statement covers all of our Group business dealings and the conduct of all persons or businesses with whom we contract directly or whom we appoint to act on our behalf.

We expect all those companies who have, or seek to have, a business relationship with Avonside Group Limited and/or any member of our Group, to familiarise themselves with our anti-slavery values and to act at all times in a way which is consistent with our anti-slavery policy.

## **About Us**

Avonside Group Limited is Britain's largest roofing contractors, offering true coverage across UK via its 29 strong branch network. The Avonside Group is made up of a family of specialist divisions with a forward-thinking vision to deliver best in class roofing at the point of delivery.

These are: Avonside Residential, Avonside Flat Roofing, Avonside Renewables, Avonside Energy, Bracknell Roofing, SM Roofing, Cobsen Davies Roofing, Tudor Roofing, Taylor Roofing, SBS Construction Group, Ploughcroft Ltd, Mid Kent Roofing and BillSave UK/Avonside Energy Limited.

With a vast wealth of knowledge spanning over 25 years, Avonside Group are able to offer a wide range of inclusive services and solutions.

The combined skills and expertise of these individual divisions' means Avonside Group are well-equipped to tackle projects of any scale or nature, servicing a variety of sectors.

Every year, Avonside Group complete over 15,000 projects and have the largest labour resource in the industry, with over 1,200 fully qualified operatives and we employ around 300 permanent staff.

## **Our Anti -Slavery Values**

We operate core business values which reflect our relationships with our clients, customers, suppliers (including sub-contractors and agency workers) and employees.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can.

We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

We have a Zero Tolerance attitude to modern slavery.

We will operate in an ethical way and with integrity in our business dealings.

We will implement systems and control methods to ensure enslavement is not taking place in our businesses or our supply chain.

## **Policy on Slavery and Human Trafficking**

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or 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.

This policy aims to prevent opportunities for modern slavery to occur within our businesses or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

As a Company, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

We expect our suppliers to hold their own suppliers to the same high standards.

Our employees have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employee's obligations under their contract of employment.

## **Due Diligence**

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and businesses in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measures:

- (i) conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- (ii) engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- (iii) where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
- (iv) introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

From the end of the financial year 2016 we will include in the directors' report accompanying our annual financial statements a reference to the Company's Slavery and Human Trafficking Statement, which will be presented on our website during the course of 2017.

## **Responsibility**

Ultimate responsibility for the prevention and prevention of modern slavery rests with the Company's leadership. The board of directors of the Company have overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations.

Line Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery

## **Actions to Report Modern Slavery or Human Trafficking**

The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with any of our

businesses or our suppliers may be reported by employees in this manner. The Whistleblowing Procedure applies to employees only and may be found in the Staff Handbook.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

The Company will accept and take seriously concerns communicated anonymously, however, anonymity does make conducting robust investigations and validation of claims more difficult and can make the process less effective. Complainants are therefore encouraged to put their names to allegations. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual

### **Training, Communication and Awareness of this Policy**

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, agencies, sub-contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

We will provide the necessary training to our employees that is proportionate and relevant to uphold our Company values on Slavery and Human Trafficking.

### **Review and Monitoring**

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time.

This Policy will be used to inform our Statement on Slavery and Human Trafficking which will be published no later than the publication of our [2016/17] financial results.

Signed: -	
Position: -	CEO
Date: -	1 <sup>st</sup> January 2021

The above Anti-Slavery and Human Trafficking Policy applies to all subsidiary branches of Avonside Group Services and Avonside Roofing Ltd 'Trading As' sites listed below:

- 1 Avonside Biggleswade Residential Roofing
- 2 Avonside Braintree Residential Roofing
- 3 Avonside Bridgend Residential Roofing
- 4 Avonside Cannock Residential Roofing
- 5 Avonside Cobsen-Davies
- 6 Avonside Colchester Residential Roofing
- 7 Avonside Driffield Residential
- 8 Avonside Edinburgh Residential Roofing
- 9 Avonside Aberdeen Residential Roofing
- 10 Avonside Glasgow Residential Roofing
- 12 Avonside Honiton Residential Roofing
- 13 Avonside Leicester Residential Roofing
- 14 Avonside Letchworth C&I Roofing
- 15 Avonside Letchworth Residential Roofing
- 16 Avonside London Flat Roofing
- 17 Avonside Scotland Flat Roofing
- 18 Avonside Midlands Flat Roofing
- 19 Avonside Newcastle Residential Roofing
- 20 Avonside Renewables
- 21 Avonside Roofing Limited
- 22 Avonside Southampton Residential Roofing
- 23 Avonside Wigan Residential Roofing
- 24 Avonside Worcester Residential Roofing
- 25 Avonside Worksop Residential Roofing
- 26 Avonside Bourne Residential Roofing
- 27 Bracknell Roofing - Burton on Trent
- 28 Bracknell Roofing - Ringmer
- 29 Bracknell Roofing - Warrington
- 30 Bracknell Roofing - Milton Keynes
- 31 Bracknell Roofing - Southampton
- 32 Bracknell Roofing - Reading
- 33 Bracknell Roofing - Leeds
- 34 Danescourt Roofing Ltd
- 35 Mid Kent Roofing
- 36 Taylor Roofing
- 37 Tudor Roofing
- 38 SBS Construction Group
- 39 Ploughcroft Ltd
- 40 SM Roofing Ltd
- 41 White Plumbing Services
- 42 M Rogerson Ltd