

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the fiscal year 1st April 2023 to 31st March 2024 and has been published in accordance with the Modern Slavery Act 2015.

Our commitment to combating modern slavery:

This statement sets down EE Smith Contracts Limited commitment to preventing slavery and human trafficking in our business activities and steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We have a duty to be alert to the risks, however small. Staff are expected to report their concerns and management to act upon them.

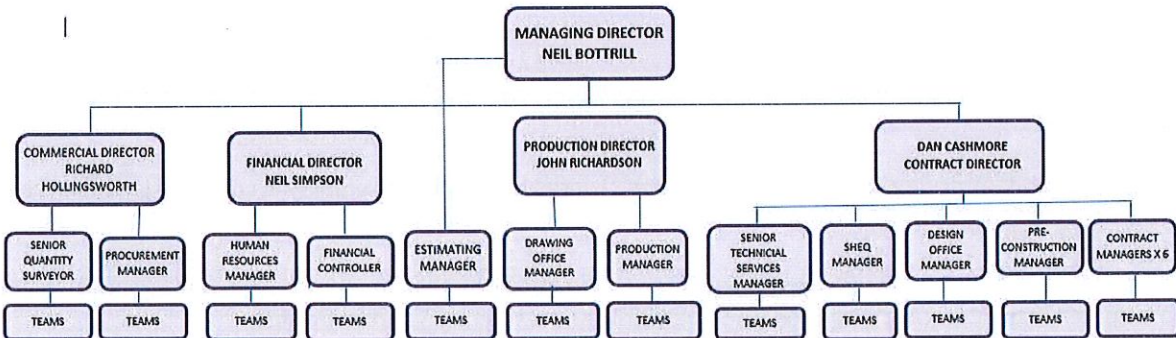
We are committed to conducting our business affairs with the highest standards of ethics, acting openly with integrity and honourable intent.

Organisational Structure and Supply chains:

This statement covers the business activities of EE Smith Contracts Limited which are as follows:

We are a leading interior fit-out contractor and joinery manufacturer, currently operating only in the UK. We can undertake contracts as a joinery contractor, an interior contractor or a main contractor.

The following organisation chart is representative of our Company structure at a senior level. The Company’s overall employee headcount on 31st March 2023 was 270.



To deliver our contracted activities, we employ in-house and agency workers and engage with sub-contractors and suppliers.

We operate a robust recruitment policy including conducting eligibility to work in the UK for all employees. All our employees are paid by bank transfer and we don’t allow payment to be made into third party bank accounts. We use reputable employment agencies, who must adhere to the Agency Workers Regulations 2010, to source any agency workers.

During the fiscal year covered by this statement, we have undertaken an assessment of our agency worker suppliers and hold on file signed documents of undertaking confirming that all agency workers supplied to our Company have been vetted and hold the appropriate Right to Work documentation.

Our supply chain is predominantly led by long-standing relationships with UK suppliers and sub-contractors. We continually assess the working practices of our main material suppliers and trade package sub-contractors. These assessments involve review of working premises and working conditions. We occasionally contract with client-led overseas suppliers for bespoke materials. **Our potential high-risk areas:**

We consider the following areas to be at higher risk of modern slavery:

- The supply of materials which may be produced in jurisdiction or by organisations that are not compliant with such legislation; and
- The potential use of sub-contractors by our contracted sub-contractors, who may be non-compliant with Modern Slavery Act. We are committed to reduce the above potential risk areas by undertaking

stringent pre-qualification when dealing with all new material suppliers and sub-contractors and re-assessing existing supplier relationships through procurement processes.

We understand that the risks of modern slavery are not static. We continue to assess our risk areas. We will continue to mitigate our exposure to modern slavery by training our staff and monitoring our supply chain.

Responsibility for the Company’s anti-slavery initiatives is as follows:

- **Policies:** The Human Resources Manager is responsible for creating and reviewing policies. The process by which policies are developed is by looking at prevailing legislation and best practice and adapting to the needs of the Company.
- **Recruitment:** The Human Resources Manager is responsible for creating effective recruitment systems that ensure appropriate checks are conducted with regards to the right to work for all employees joining the Company. Appropriate checks shall also be conducted in relation to the appointment of agency labour supplied to the Company by 3rd party suppliers.
- **Training:** The Human Resources Manager is responsible for ensuring that the appropriate training is provided where appropriate.
- **Due Diligence:** The Human Resources Manager shall aim to ensure due diligence checks are undertaken in the appointment of labour suppliers; and
- The Commercial Director is responsible for ensuring that due diligence is conducted in respect of the Company’s supply chain.



Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company aims to train staff, where appropriate by means of Toolbox Talks, Online Training, and updates.

The risks of modern slavery and human trafficking is covered during all new employee company inductions and as part of our Company Handbook.

For the Financial year covered by this statement, a number of the Company’s Site Management Team, participated in the CIOB: Tackling Modern Slavery In The Construction Sector Workshop.

This statement for the year ended 31st March 2023 was reviewed and approved by the Board of Directors in April 2023

Policy Title:	Modern Slavery and Human Trafficking
Policy Creation Date:	April 2020
Policy Creator:	HR Manager
Policy Review Date:	April 2023
Next Review Date:	March 2024
This policy has been approved and authorised by:	
 Neil Bottrill Managing Director Date: 4-4-2023	 Neil Simpson Finance Director Date: 4/4/2023