

Modern Day Slavery Act 2015 Policy Statement

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by COLE Group during year ending 31 December 2019 to prevent modern slavery and human trafficking in its business and its supply chains.

COLE Group is committed to combatting modern slavery of any kind within our operation. We all have a responsibility to be aware of the risks, however small in our business and wider supply chain. Staff are expected to report concerns, using appropriate reporting channels and management are expected to act upon them.

Organisational structure

COLE Group consists of COLE Group (The trading company). The organisation operates within the construction industry and employs staff across its site network and head offices.

Our business

Our business is organised for operational purposes across multi sites, and over seen by Head Office.

Our supply chains

We procure a wide range of goods and services through a diverse supply chain, which includes:

- Main contractors
- Subcontractors who provide materials, labour and plant
- Manufacturers and suppliers who deliver direct to site or to the Subcontractor
- Utility companies, and
- Professional and specialist consultants linked to core activity.

Several of our suppliers will have turnovers which trigger a requirement to comply with the obligation to produce a Slavery and Human Trafficking Statement under the Act. In any event, we actively encourage all our suppliers notwithstanding the contents of the Act to ensure that they comply with the spirit and intent of the Act.

We have a stable supply chain allowing us to benefit from a significant number of long-standing trading relationships with like-minded Subcontractors, Suppliers and Consultants who share our values and ethics.

The materials that are ordered directly by our Regions or indirectly by our subcontractors are procured, in the main, under a National Supply Agreement by our centrally based Procurement Team who apply rigorous due diligence and tender processes.

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. Our policy reflects 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.

Due diligence processes for slavery and human trafficking

COLE Group employs solely within the UK. Our recruitment procedures ensure that all prospective employees are legally entitled to work in the UK.

We only procure agency labour from agencies affiliated with trade boards which we know are compliant ethically and legally.

Supplier adherence to our values and ethics

We are committed to combatting slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values a Supplier Code of Conduct is being developed that will be sent out annually requiring all suppliers and subcontractors to confirm their commitment.

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/providers.

Further steps

We will continue to review the effectiveness of this policy and will look to ensure that we are adopting best practice and enforcing effective systems to prevent, monitor and eliminate slavery and Human trafficking.

For transparency, the company will publish the Modern-Day Slavery and Trafficking Act 2015 Policy Statement on its website for public review.

This policy applies to all those employed by COLE Group Ltd.

Signed: .....

Position: **Managing Director**.....

Date: **5th April 2019**.....