

## Modern Slavery statement for financial year 2021

This statement has been created in line with the Modern Slavery Act 2015 and sets out the steps that Sewell Construction take and continue to take, to ensure that modern slavery and/or human trafficking does not take place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Sewell have a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Our Business

Sewell Construction is a leading UK construction company with an annual turnover of £20m. Our extensive supply chain ranges from large subcontractors providing specialist services such as mechanical and electrical installations, to providers of labour, goods and services. 82% of the cost of our sales is spent on goods and services procured from suppliers. While we directly employ around 66 people, we have in the region of 260 subcontractors working on our projects across the Yorkshire region. Our supply chain is an integral part of our operations, and our success and reputation is linked to their performance and ethicality.

Sewell Construction has a strong culture and set of values setting expectations of our people to do the right thing, not just for the environment, but for our people, supply chain, communities and the business. Our core values and total commitments include looking after our people, sourcing responsibly and creating value for both our customers and the communities in which we operate. Our approach is to develop long-term partnerships with suppliers to ensure these are achievable.

### Our Supply Chain

Sewell Construction have a diverse collection of supply chain companies based across the UK, and have specific systems and 'champions' to monitor and manage these. All suppliers are required to complete PAS91 compliant questionnaires, which include a legal compliance declaration, and provide business information as part of their registration as a preferred supplier.

### Our Policies

We recognise that slavery, servitude, forced labour and human trafficking (Modern Slavery), is a growing issue worldwide. We have a zero-tolerance approach towards this both in our operations and our supply chain.

We operate a number of internal policies across the individual business units to ensure that we are conducting business in an ethical and transparent manner. These are extended to our supply chain and more information on these is outlined below.

1. Our procurement policy is to source goods and services efficiently and fairly. Our procurement methods are compliant with legislation, including health and safety regulations, and conforms to our ethical, environmental and responsible business standards.
2. Anti-Fraud, Bribery & Corruption policy. This policy states a zero-tolerance approach to these behaviours and to the deterrent of inappropriate practices within the business linked to this.
3. The Code of Conduct on our Company Business policy explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
4. Our Equal Opportunities & Dignity at Work policy is governed by the Equality act, this policy explains the manner in which we treat and care for our people, customers, supply chain and potential recruits, ensuring dignity, respect and fairness is promoted at all levels across the business.

### Training

Our relevant staff have all been provided with training to identify and manage any associated risks with modern slavery. An external provider that assesses participant understanding and knowledge of the Act provides the training. We coach our supply chain and provide material to also identify and manage these risks via our supply chain approval process and induction process.

### Due Diligence

We regularly review our policies and procedures and our focus on supply chain in 2021 will include a revised assessment and demonstration of their adherence to the Modern Slavery Act

### Areas of Risk

We recognise the diversity of our supply chain across the business, and see the core risks being the supply of goods and services which may have involvement in human slavery, trafficking and/or any other form of exploitation. The review noted under due diligence above will ensure any such risks are mitigated.

**Approval for this statement**

This statement was approved by the Board of Directors on 7th January 2021.

Signed: 

Position: Operations Director

Dated: 21<sup>st</sup> July 2021

Review Date: 15<sup>th</sup> December 2021