

MODERN SLAVERY ACT 2015 STATEMENT

Introduction

This statement sets out Sykes & Son's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

As part of the Construction Industry the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Policy Statement

Sykes & Son Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, in our supply chains and in our business partners, we provide relevant training to our staff.

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Commitments

- We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:
- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk-based approach we may require:
 - employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
 - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships

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.

We are aware that risks arising from modern slavery and human trafficking can apply anywhere in our operations, whether through direct employment, sub-contracted

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employees or the supply of materials. We expect our suppliers and subcontractors to ensure that there is no slavery or human trafficking in their supply chain. Where issues are identified (including through our audit process) that are not resolved to our satisfaction, we review the on-going nature of the relationship with that relevant organisation.

Due Diligence Processes for Slavery And Human Trafficking

As part of our initiative to identify risk and mitigate against such risks we nominate senior representatives of the company, who in turn report to the Board of Directors.



Chris O'Donnell (Managing Director)

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