



SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

OPENING MODERN SLAVERY STATEMENT

Food Sector Construction Limited (FSC) is committed to preventing modern slavery and human trafficking within its business and supply chain. Furthermore, we expect these same principles from our suppliers.

STRUCTURE & SUPPLY CHAINS

FSC is a company that completes construction and maintenance projects across the United Kingdom and employ around 50 people full-time. For more information about FSC and our operations, please refer to the 'About Us' page on our website. www.fscl.co.uk.

Due to the nature of our operations, we work in association with a plethora of agencies, professionals, sub-contractors and suppliers.

FSC operates within the United Kingdom's highly regulated construction sector, and this means all works carried out complies with all relevant tax and health & safety regulations. The senior management believes that these regulations play a considerable part in the reductions of Modern Slavery Act 2015 infringements.

Several circumstances reduce the risk of slavery and human trafficking within Food Sector Construction's supply chains and include:

- The work we carry out ordinarily requires skilled operatives who have obtained the necessary professional/trade qualifications to do their job.
- We operate all year round and not seasonally. We do not rely on vast numbers of unskilled labour at specific times of the year to fulfil our operational needs.
- All work carried out on FSC sites is overseen by FSC employees. This policy allows us to take full ownership of our projects.
- Our sub-contractor supply chain is, on the most part, generally short. We work with regular sub-contractors based in the United Kingdom and regulated by the same rules as ourselves.



- The preponderance of the materials used on FSC projects are sourced through UK businesses and distributors who sit within our supply chain. This practice allows greater compliance with the Modern Slavery Act 2015.
- Materials sourced outside of the United Kingdom, including the European Union and beyond, is rare. The few and far between instances of these procurements means we take bespoke measures on each occasion.

Because we are a family-owned and managed business, our relationship with our employees allows a robust two-way dialogue between senior management and all employees. These regular and open relationships support the best environment to raise any concerns regarding slavery and human trafficking.

THE FSC COMMITMENT TO PREVENTING MODERN SLAVERY

Food Sector Construction will raise awareness amongst its workforce regarding modern slavery and human trafficking within the UK construction industry. Furthermore, the company ensures that employee pay and working conditions constantly remain consistently high and above standards set out by the Act. The company directors will investigate any possible infringements. Moreover, senior management will also investigate any suggestions to improve procedures within the company. Support and subsequent investigations of complaints and accusations will go through a formal grievance procedure. The FSC directors believe that there is a shallow risk of infringing the Modern Slavery Act 2015 as the following measures are in place:

- All FSC employees receive standardised full written conditions of employment that comply with the Act.
- FSC does not employ casual labour.
- All FSC employees receive pay at or above the "Living Wage" threshold.
- All staff receive the appropriate and relevant training promptly.
- Food Sector Construction regulates any work experience and internships through a standardised risk assessment.



PREVENTING MODERN SLAVERY IN OUR SUB-CONTRACTOR SUPPLY CHAIN

Food Sector Construction will prevent modern slavery and human trafficking within our sub-contractor supply chains by reducing the risks and influencing behaviours within our directly contracted sub-contractor businesses. Any failure to address issues that results in a breach of the Act, a possible breach, or a perceived breach of the Act could impact the reputation of FSC and will be investigated. This investigation could result in several actions, which includes removal from our supply chain.

Within the financial year, Food Sector Construction will carry out the following activities:

- Food Sector Construction will remind our supply chains of their responsibilities to their supply chains and the implications of working with FSC. Furthermore, FSC will also provide a reporting facility for any breach and potential or perceived breaches.
- Any business covered by the Act is expected to provide their slavery and human trafficking statements for our records and review.

It is the responsibility of all Food Sector Construction employees to ensure compliance with these requirements.

PREVENTING MODERN SLAVERY IN OUR MATERIAL SUPPLY CHAIN

Food Sector Construction will prevent modern slavery and human trafficking within our material supply chains by reducing the risks and influencing behaviours within our directly contracted material provider organisations. Any failure to address issues that results in a breach of the Act, a possible breach, or a perceived breach of the Act could impact the reputation of FSC and will be investigated. This investigation could result in several actions, which includes removal from our supply chain.

Within the financial year, Food Sector Construction will carry out the following activities:

- Food Sector Construction will remind our supply chains of their responsibilities to their supply chains and the implications of working with FSC. Furthermore, FSC will also provide a reporting facility for any breach and potential or perceived breaches.
- Seek copies of our material suppliers' statements regarding slavery and human trafficking. This statement is to be taken as evidence that the organisation is starting to address this vital issue and ensure compliance with the Act in the current year.

It is the responsibility of all Food Sector Construction employees to ensure compliance with these requirements.



OUR DUE DILIGENCE PROCESSES IN REGARDS TO MODERN SLAVERY

Within the framework of our continued efforts to monitor, control, and decrease the risk of slavery and human trafficking transpiring within our business or that of our supply chains, we adopt the following due diligence procedures, which aim to:

- Recognise, monitor and control areas seen as a possible risk within our business and supply chains.
- Examine any recognised areas of risk within our business and supply chains.
- Embrace a zero-tolerance procedure to slavery and human trafficking throughout FSC and our supply chains.
- Give assistance and security from harm or detriment to anyone who raises genuine concerns amounting to a protected disclosure.

RISK & COMPLIANCE

Food Sector Construction will undertake a risk assessment of critical risks to infringements of the Act within our businesses, sub-contractor, and material supply chain. As a result, this will distinguish the areas of concern and the acts that we will implement this year and manage this risk as effectively as possible.

Conducted risk assessments are carried out in association with senior figures within the business and will include members of staff involved with procurement and those who manage our supply chains.

Conducted risk assessments will also review the most suitable form of whistleblowing to ensure compliance with the Act.

REVIEWING SUCCESS & EFFECTIVENESS OF OUR POLICIES & PROCESSES

Senior members of the FSC team will ascertain suitable benchmarks within the current financial year to ensure that slavery and human trafficking is not happening within the company or supply chains.

The directors will investigate any highlighted risks and manage them accordingly.



TRAINING

Food Sector Construction ensures all employees know of the risks associated with modern slavery and human trafficking within our company and supply chains. The following examples detail how we as a business enable our employees to identify and report any potential violations of FSC's anti-slavery and human trafficking policies:

- Company policy and reporting procedures are readily available to all members of staff. New starters are required to read company policy upon joining the company.

All senior employees to receive the appropriate training regarding the Act, the requirements of it, and the support available. This training may be repeated if required.

FURTHER ACTIONS

Following our review of our operations this financial year to prevent slavery or human trafficking from occurring in our organisation or supply chains, we plan to take further steps to tackle slavery and human trafficking:

- Review and amend the current policy, and consider the introduction of new or additional procedures.
- Consider the possibility of appointing an independent body to carry out an annual audit of our business and supply chains to monitor how successful we have been at preventing slavery and human trafficking.
- Modern Slavery Briefing notices to implemented on our construction sites. These notices will include signs to spot potential victims.

This statement is made in conformity with section 54(1) of the Modern Slavery Act 2015 and constitutes Food Sector Construction Limited's slavery and human trafficking statement for the financial year ending 31st December 2021.

Sharon Brown

Director

