

Emtec Group



Modern Slavery and human trafficking statement

September 2017

The Modern Slavery Act 2015 requires any commercial organisation carrying on business in the UK with a total annual global turnover of £36m or more to produce a slavery and human trafficking statement for each financial year of the organisation. The statement must be published on the organisation's website and a link to the statement must be in a prominent place on the home page.

Modern Slavery is a term which encompasses slavery, servitude and forced or compulsory labour. Human trafficking is defined as arranging or facilitating the travel of another person with a view to that person being exploited. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

This statement sets out the steps that all companies within the Emtec Group have taken during the previous 12 months to ensure that modern slavery and human trafficking is not occurring in our organisation or in our supply chains.

Organisational structure and activities

The Emtec Group has been identified as one of London Stock Exchange Group's 1000 Companies to Inspire Britain. The report is a celebration of the UK's fastest-growing and most dynamic SMEs across the UK.

This is the third time Emtec have made the list which is a great achievement. To be included, companies are required to show consistent revenue growth over a minimum of three years, significantly outperforming their industry peers. As such, Emtec is the only Scottish company to be included in the report in their category. We are a national business with a local presence and have 9 offices across the UK.

The Emtec Group of companies is made up of the following trading companies:

Emtec Building Services Ltd, Emtec Solutions Ltd, Emtec Property Services Ltd, DRB UL Maintenance Ltd, Emtec Branding Ltd, Emtec Facility Services Ltd, Emtec Energy Ltd, Emtec Fire Systems Ltd, Emtec Group Management Ltd, Emtec Building Services SW Ltd, Emtec Building Services NE Ltd, Emtec Building Services Midlands Ltd, Emtec Core & Protect Ltd

Supply chain structure and activities

Our trading activities are focused within the UK. Any company on our preferred supplier list are obliged to complete a Supplier or Sub Contractors Compliance Form and must agree to the following:

- A zero-tolerance policy with regard to slavery and human trafficking.
- Not force or coerce temporary workers to work against their will.
- Not threaten or subject workers to physical or mental mistreatment.
- Treat applicants and workers with dignity and respect.
- Raise any knowledge or suspicions of illegal or dubious activities regarding agents, temporary workers or colleagues to the Modern Slavery Helpline on 0800 0121 700.
- Ensure any subcontractors are aware of, and agree to, these terms.

Due diligence

The company directors and senior management shall take responsibility for implementing this policy and its objectives and shall provide adequate resources (training etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation or within its supply chains.

- The Emtec Group has put in place a fair and transparent recruitment and resourcing procedure in relation to labour practices, false employment and modern slavery in accordance with relevant legislation and standards.

- The Emtec Group expects all suppliers to conduct right to work checks of their workforce in accordance with the Immigration, Asylum and Nationality Act 2006, which will be reinforced when a worker attends their induction where papers will be verified.
- The Emtec Group seeks to work in partnership with all suppliers to tackle and combat the threat of human trafficking and modern-day slavery across the construction industry and throughout our supply chain, in accordance with international environmental, social and ethical standards.
- The Emtec Group have a clear whistle blowing policy, which provides a path for employees and suppliers to report any suspected legal or ethical breaches.
- In order to ensure the highest level of understanding of the risks associated with modern slavery and human trafficking in our supply chains, Emtec provides training for all relevant staff members.
- Emtec uses KPIs to measure effectiveness in ensuring that slavery and human trafficking is not taking place in any part of the business or supply chain.

Risk assessment

- Our policies, listed below, require our suppliers and sub-contractors to complete an assessment to confirm that they comply with Emtec's zero tolerance policy.
- Our standard contractual terms have been updated to include compliance from our suppliers and subcontractors with our Modern Slavery and Human Trafficking Policy.
- We have issued a Group wide policy confirming our zero tolerance of modern slavery and human trafficking.
- We undertake proof of eligibility checks to work legally in the UK.

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 Anti-Slavery 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.

- Modern Slavery policy
- Recruitment policy
- Procurement policy
- Supplier code of conduct
- Employee code of conduct
- Grievance and whistle-blowing policies
- Training policy

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 relevant members of staff. All Directors have been briefed on the subject.

Our Effectiveness in combating slavery and human trafficking

We use the following KPIs to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Company audits by directors and managers in each company;
- Labour monitoring and payroll systems; and
- Communication and personal contact with the link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

This statement has been approved by the company's Board of Directors.

Signature:

Name:

Position: Director



SCOTT STEVENSON