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## Introduction

This statement sets out Dyer & Butler's Group strategy to enable identification of all potential modern slavery risks relating to the Company supply chain.

This statement relates to the financial year 01 November 2016 to 31 October 2017.

As part of the Civil Engineering, Building and Mechanical & Electrical industry with Construction sites spanning the country, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery, human trafficking and the exploitation of children and young people.

## Organisational structure and supply chains

Dyer & Butler is a Civil Engineering business to build, maintain and renew infrastructure within both the public and private sector, delivering civil engineering, building and M&E projects of all sizes, throughout England and Wales.

For over 35 years Dyer & Butler have undertaken highway, airport & rail specific construction work under framework and standalone contracts from maintenance through to major projects. Dyer & Butler also work for local authorities on river & marine, waste and water civil engineering projects.

Dyer & Butler purchase a wide range of goods required in the operation of the business and also rely heavily on a number of key suppliers for the delivery of core work. Dyer & Butler strive to form good working relationships with suppliers and communicate expectations through the supply chain.

It is noted that the Construction industry, construction sites, are targeted particularly by the trafficking regime. It is prevalent within the Construction industry that labour practices for migrant workers is historically poor with higher risk categories to include the Middle of England which the Company has operational areas within.

As this has been identified as a key risk area to the Company, measures are imposed for stringent identification checks to be undertaken with all direct employees and application of key labour policies are enforced.

The company expects all labour agencies to adhere to the company's principles on slavery and human trafficking with compliance being assessed through supplier questionnaires and contractual protections to ensure compliance.

## Responsibility

Whilst it is acknowledged that the responsibility in respecting Human Rights and environmental issues in the supplier chain is the suppliers' responsibility Dyer & Butler will communicate our values and expectations throughout the supply chain.

It is the responsibility of the Quality assurance team in liaison with the HR department to ensure that policies are implemented and reviewed and the processes outlined are sound and fit for

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purpose to ensure compliance with the company's objective to eliminate human trafficking and slavery.

It is the responsibility of the buying team and all Site Agents and management above to risk assess the suppliers that the company use to undertake work and supply resources.

The Company will ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, and human rights, social and legal standards in line with the supply chain of any products supplied to us.

It is the responsibility of the Quality assurance in liaison with HR team to undertake investigations and due diligence in relation to suspected instances of slavery and human trafficking.

### **Relevant Policies**

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to prevent slavery and human trafficking in its operations.

Employee code of conduct:

The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strive to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.

Procurement code of conduct:

The Company is committed to ensuring that its suppliers adhere to the highest ethical standards. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their workers working conditions. However If serious violations of the Company supplier code of conduct will lead to termination of the business relationship.

Recruitment / Agency Workers:

The Company uses only specified reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Compliance with Human trafficking and slavery form part of the contractual terms of acceptance when a new supplier labour agency is utilised by the company.

Corporate Social Responsibility:

The Company is clearly focused on achieving commercial success, but we realise that the way in which we run our business has an economic, social and environmental impact. We have a Corporate Social Responsibility framework to ensure we maintain the focus on achieving commercial success by incorporating ethical values, respect for people, communities and the natural environment into our business activities, culture and strategy.

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## Due Diligence

The Company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- Undertaking risk analysis to the supply chain on geographical location and or product to ascertain high risk categories.
- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- Taking steps to improve substandard suppliers practices including providing advice to suppliers and requiring them to implement action plans.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct including termination of the company relationship.

## Training

The Company requires all levels of management who will come into contact with the use of suppliers to complete an on line training course by the end of the financial year.

The Company's modern slavery training course covers:

- The Modern Slavery act and the importance in supply chain relationships and the importance to the company of compliance.
- The company purchasing practices, which influence supply chain conditions.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the Company, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the company;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- what steps the Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the company's supply chains.

## **Awareness-raising programme**

As well as training staff, the Company has raised awareness of modern slavery issues by circulating a series of emails to staff.

The emails explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

**Signed -**

Mr Neil Edwards, Managing Director

**Dated –**

**Date of next review –** January 2018