



SLAVERY AND HUMAN TRAFFICKING STATEMENT 2019-20



This statement refers to the activities of:

1. FES Holdings Ltd parent company of FES Ltd, CHES Ltd, OES Ltd and Forth & Oban (Stirling) Ltd and
2. Forth Holdings Ltd parent of FES FM Ltd, FES Support Services Ltd, AAC Ltd, Ignis (Wick) Ltd & Forth & Oban Ltd.

The companies named above are predominantly involved in design, supply, installation, operation, maintenance, FM & lifecycle activities relating to the built environment. We operate UK wide and across public and private industry sectors. We recognise trade unions in certain companies within the Group. Our 1st tier supply chain is all UK based and we do not directly source labour, goods or services from countries associated with high risks of slavery or human trafficking.

We have taken the following steps to prevent slavery and human trafficking within our business:

- We comply with all UK law applicable to working standards and human rights.
- Our Corporate Social Responsibilities (CSR) Policy and Human Resources (HR) Employees' handbook outline the company policies & procedures for managing people, human rights standards, preventing slavery & human trafficking and to protect everyone from any form of victimisation or vulnerability.
- Investigations where a number of unrelated workers use the same personal information.
- Raising awareness of modern slavery issues, risk awareness, decision-making & swift action where appropriate.

To prevent slavery and human trafficking within our supply chain we:

- Have in place ethical trading policies and robust purchasing procedures.
- Assess our supply chain and only engage with supply chain members who have similar commitments and can demonstrate that they do not condone slavery and human trafficking in any form.
- Undertake checks prior to entering into any contract with new suppliers via our supplier evaluation policy to ensure that the prospective supplier does not operate contrary to the Modern Slavery Act.
- Factor legal & fair full labour costs when outsourcing to avoid potential for cheaper slave or bonded labour by using reputable UK based suppliers who have similar obligations and have set standards similar to our own.
- Avoid making demands of suppliers or subcontractors that might lead them to violate human rights.
- Ensure that zero tolerance for modern slavery and respect for human rights, including children's rights, are built into contracts and represented in other dealings as appropriate.

We have put in place due diligence procedures proportionate to the identified modern slavery risk:

- For UK based supply chain members we continue to develop our knowledge about first-tier suppliers' controls and where appropriate we ensure that they have similar controls in place to manage the downstream risk.
- If we ever consider working with suppliers based in high risk countries we will seek expert support.
- Participation in industry schemes which actively audit our slavery and human trafficking efforts.

The following indicators have been introduced to measure our performance in this area as appropriate:

- Breach rates of our Slavery and Human Trafficking Policy.
- Monitoring of modern slavery issues, risks and incidence of actions taken.
- Invocation rates of grievance and whistle-blowing procedures by employees and others.
- Details of the supplier evaluation checks undertaken and the outcomes.

We have not yet detected any, but incidences of modern slavery will be reported to the police immediately. Relevant remedies will be made available to potential victims. We will ensure everyone in our organisation that make key certain decisions relating to human resources and procurement are made aware of the risks of modern slavery to ensure informed decisions are made in a way which mitigate and manage these risks. We continue to monitor and improve the effectiveness of our relevant policies. This statement will be revised at the end of each financial year or in the interim should anything significant change.

Signed

Duncan K Fletcher
Vice Chairman

