

TITLE: MODERN SLAVERY ACT – ANNUAL STATEMENT 2016/17

REF: FFG Q22

Revision Number	Date of Last Review	Date of Next Review	Classification	Management System Reference	Approved
1	16/01/2017	15/01/2018	Controlled	QMS/FFGQ22	James Cornwell

Modern Slavery Statement 2016/17

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Fourfront Group during year ending 31st December 2016 to prevent modern slavery and human trafficking in our business and supply chains.

Introduction

We know that slavery, servitude, forced labour and human trafficking (Modern Slavery) is a global and growing issue given the rapid rise in global migration, existing in every region in the world and in every type of economy, whether industrialised, developing or in transition. No sector or industry can be considered immune or untainted. Fourfront Group has a zero-tolerance approach to Modern Slavery of any kind within our operations and supply chain. 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, using the appropriate reporting channels, and management are expected to act upon them.

Our business and supply chains

Our business depends on a reliable, global network of suppliers and subcontractors - more than 80 companies provide us with services and products.

We expect all suppliers to demonstrate responsible business practices, including ethical sourcing and protecting human rights. We aim to fulfil this commitment by seeking relationships with suppliers who share a common commitment to:

- Conduct business in an ethical manner and abide by all legal and regulatory requirements
- Comply with the international labour practice standards with specific focus on the ILO Conventions including conventions pertaining to;
 - freedom of association and the right to collective bargaining
 - elimination of all forms of forced or compulsory labour
 - effective abolition of child labour
 - elimination of discrimination with respect to employment and occupation
- Respect the human rights of all stakeholders in the supply chain
- Provide a safe and healthy workplace to its employees and other partners
- Demonstrate commitment to protect the environment by conserving natural resources, preventing pollution, implementing waste reduction and management programs and minimising its impact on the climate
- Promote diversity and inclusivity
- Maintain transparency and disclose sustainability performance and practices in line with regulations or

international practices

- Demonstrate leadership by propagating the sustainability agenda upstream to its own supply chain

A system and process driven approach based on our management system principles ensures compliance with these standards and demonstrates continual improvement.

Fourfront Group looks forward to building sustainable and mutually rewarding partnerships with its supply chain with a view to contribute to its own business governance and that of the people & planet.

Policies and contractual controls

Fourfront Group's internal policies cover human rights and ethical and safe working practices.

We are a UN Global Compact signatory, and confirm that we will not tolerate or condone abuse of human rights within any part of our business or supply chains and will take seriously any allegations that human rights are not properly respected. We also operate a whistleblowing policy, aimed principally at our employees but also available to others working in our supply chains which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully investigated and appropriate remedial actions taken.

All of our policies are developed by subject matter experts, and signed off at Director-level.

All suppliers are required to comply with our Fourfront Group's Terms and Conditions and code's of conduct, and with business-area specific ethical policies, which require them to: participate in audit assessments. We will only deal with suppliers and subcontractors that;

- Provide employees with good working conditions, fair treatment and reasonable rates of pay; and
- Respect workers' human rights and comply fully with all applicable laws.

The above policies also require that:

All work must be voluntary, and not done under any threat of penalties or sanctions

- Workers must not pay any deposits for work, and employers – whether labour users or recruiters – must not keep original copies of identity documents.
- Indentured labour is prohibited, and workers must be free to leave work at any time, with all salary owed to be paid.

Due Diligence and audits of suppliers and supply chain

We understand that our biggest exposure to Modern Slavery could lie within our subcontractor network.

Within these areas, new suppliers are subject to due diligence checks in the form of subcontractor and supplier audits which are conducted by, or on behalf of the Fourfront Group's Operations Director. Such audits are also regularly conducted for existing suppliers. These audits assess compliance with legal requirements, health & safety, ethical and sustainable business practices and are, amongst other things, intended to identify any Modern Slavery practices.

Supplier standards

We expect our suppliers to uphold the same standards for business conduct we ask of our own employees, building capacity amongst suppliers to live these values improves environmental and social conditions worldwide.

Supplier diversity

We are strongly committed to using and developing local and small business suppliers including promoting women in the construction industry.

Progress towards a sustainable supply chain

We pursue sustainable supply chain management by engaging and doing business with subcontractors and



suppliers in ways that drive affordability and innovation through responsible sourcing and environmental stewardship.

The goal is to align our supplier base's social, ethical, environmental, safety and health responsibilities with our own ethical goals and objectives.

Assessment of Modern Slavery risk within our supply chain

In the past year we have increased our focus on Modern Slavery within our wider business operations, we have mapped our supply chains to assess particular industry/sector and geographical risk, these assessments cover the entire scope of our business.

Modern Slavery training

We have trained our key staff in Modern Slavery and human rights using information provided by HM Government and the Home Office.

Assessment of effectiveness in preventing Modern Slavery

We understand that Modern Slavery risk is not static, and we will continue to improve our approach to mitigating this risk in the year ahead.

In order to assess the effectiveness of the measures taken by Fourfront Group we will be reviewing the following key performance indicators and reporting on them in future Modern Slavery Statements:

- staff training levels;
- actions taken to strengthen supply chain auditing and verification;
- steps taken to upskill our high-risk suppliers, and assessing their ability to detect and mitigate modern slavery risk in supply chains; and
- investigations undertaken into reports of Modern Slavery and remedial actions taken in response.

Signed

James Cornwell

1st January 2017

Revision			
Version Number	Date	Detail Revision to Procedure Carried Out	Signed

