



Slavery & Human Trafficking Policy Statement (Modern Slavery Act 2015)

Introduction.

We are committed to improving our practices to combat slavery and human trafficking. Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Organisation Structure

Grangewood is a leading building contractor in the London area specialising in residential and heritage projects. With over 100 employees and a turnover of +£25 million.

Our Business

Our head office is based in Loughton, Essex and the majority of our projects are based in London and the South East.

Our Supply Chain.

Our supply chain include a large range of construction suppliers ranging from raw materials to fixtures and fittings. All our approved suppliers are SSIP accredited.

Our Policies on Slavery & 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.

Due Diligence Processes for Slavery and Human Trafficking.

As part of our initiative to identify and mitigate risk we have reviewed all our supply chain and subcontract documentation and have updated our corporate social responsibility policy to include slavery. Grangewood is audited by external auditors WCS in compliance of ISO standards. In addition to monthly internal ISO audits by our Compliance Manager.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.

- Monitor potential risk areas in our supply chains.
- Protect whistle blowers (through our Raising Concerns Policy).

Supplier Adherence to our Values.

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics, we have a Group Compliance Manager who works closely with the Operations Director to ensure the prevention of slavery is incorporated in to the company's document management systems.

The compliance manager's remit is to ensure all of our business partners comply with the high standards which we set for ourselves and ensure that their own organisations and supply teams are free from slavery and human trafficking.

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 our senior staff.

Our Effectiveness in combatting slavery and human trafficking.


We use the following key performance indicators (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:

- Monitoring of supplier agreements/annual turnover for compliance and adherence.
- Ensuring proof of eligibility to work in the UK is sought for our employees and assurances that this is carried out by our subcontractors and suppliers.

Further Steps.

We will review our policies to ensure that there is no slavery or human trafficking in our supply chains and we will take the further steps to combat slavery and human trafficking such as requesting copies of supplier slavery statements on an annual basis in line with legislation.

This statement is made pursuant to section 54(1) of the Human Slavery Act 2015 and constitutes our Group's Slavery and Human Trafficking Statement for the financial year ending 30th June 2017.



Emma Maile

Operations Director

Dated : 01/03/2019