

**MODERN SLAVERY:  
ANTI-SLAVERY AND HUMAN  
TRAFFICKING POLICY**

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***Our Mission.....***

*to be a property  
solutions business you  
want to be part of.....  
... by  
being a reliable  
relationship based  
business that is the  
first choice for our  
customers, suppliers  
and employees....*

***Our Values....***

*operating in a safe &  
healthy manner.*

*be performance-driven*

*showing that relationships  
count*

*Having the right people  
doing the right things*

*contributing positively to  
our communities*

*showing relationships  
count*

## Statement

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Simons Group Ltd (Owned by Lincoln and London Holdings) and all its subsidiaries (Simons Construction Ltd, Simons Developments Ltd and Simons Design Ltd) is committed to ensuring that slavery and human trafficking is not taking place within its workforce or supply chain.

### OUR STRUCTURE

Simons Group has been providing tailored property solutions to its clients for over seven decades, focusing on retail and commercial, health and pharmaceutical, and industrial and distribution. A private company employing more than 180 people throughout the UK, Simons key business units – Simons Developments, Simons Design and Simons Construction - collectively target an annual turnover in excess of £150 million. The Group is focussed on building long-term, sustainable partnerships with stakeholders including customers, consultants and supply chain.

This statement is made on behalf of Simons Group and the individual group companies referred to above in accordance with the requirements of the Modern-Day Slavery Act 2015.

### OUR SUPPLY CHAIN

Our supply chain incorporates over 50 different trades, for which we have identified the following as being of higher risk profile to modern slavery:

- Trade and labour agencies
- Demolition contractors
- Groundworker contractors
- Mechanical and electrical contractors
- Painting and decorating contractors
- Joinery contractors
- Masonry contractors
- Cleaning contractors

### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring there is no modern slavery or human trafficking in any part of our business. Our Anti-Slavery **Policy** reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery or human trafficking is not taking place anywhere in our business or supply chain.

### OUR PROCESSES

As part of our initiative to identify and mitigate risk we have implemented several processes to ensure, as far as reasonably practicable, that our workforce and supply chain adhere to our expectations. We have:

- Identified and assessed potential risk areas within our supply chain and clearly communicated our statement, policy and expectations to our supply chain. We have and will continue to highlight the importance of tackling and combating the threat of human trafficking and modern-day slavery across the construction industry
- Mandated, for select trades, accreditation with Construction Line who are an independent 3<sup>rd</sup> party construction industry accreditation provider
- Revised our Supply Chain Code of Conduct which forms part of our internal supplier PQQ validation process
- Carried out internal audits, interviewing our employees and labour
- Continually reviewed our recruitment process to ensure it is fair and transparent, and that candidates are robustly vetted and their identities verified.
- Communicated our internal code of conduct anonymous whistleblowing hotline, and external whistleblowing methods.

### **OUR TRAINING**

We provide training to our staff to ensure high levels of understanding around the risks of modern slavery and human trafficking in our business and supply chain.

### **OUR FUTURE STEPS**

We will continually review our approach to modern slavery and human trafficking, and will develop a process which enables us to monitor and measure our performance. This performance measure will then form part of our annual CSR report.

This statement is made pursuant of Section 54, Part 6 of the Modern Slavery Act 2015, and sets out the steps Simons Group has taken to ensure that slavery and human trafficking is not taking place in our business, or any part of our supply chain.



**Tom Robinson, Chief Executive**

For and on behalf of Simons Group Limited and its Group companies

**April 2019**

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## **1. INTRODUCTION**

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, 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 implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 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.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## **2. SCOPE**

2.1 The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The Modern Slavery working group has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the compliance manager.

### **3. COMPLIANCE**

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify your manager or HR as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or HR to report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or HR or through the confidential helpline (0800 0121 700).
- 3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Head of HR immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the Intranet.

### **4. COMMUNICATION AND AWARENESS OF THIS POLICY**

- 4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **5. BREACHES OF THIS POLICY**

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## **6. FURTHER INFORMATION**

6.1 If you have any queries regarding this policy please contact a member of the Modern Slavery working group (Head of HR; Head of Sustainability; Head of H&S or Supply Chain Manager).