

SIMONS GROUP MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

OCTOBER 2016

Simons Group 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 200 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 includes:

- 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 a number of 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 Achilles Building Confidence who are an independent 3rd 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

October 2016