



Modern Slavery & Human Trafficking Statement for Financial Year 2018/19

Introduction

This statement is made pursuant to S54 of the Modern Slavery Act 2015 and sets out the steps that Stanmore Quality Surfacing Ltd (SQS) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within both the Company or our Supply Chain.

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. SQS does not tolerate any form of modern slavery. SQS is committed to acting ethically, with integrity and transparency in all its business dealings and to implementing effective systems and controls to safeguard against any form of modern slavery taking place across the Company or Supply Chain.

Our Business and Structure

SQS is a leading utility solutions provider serving the energy, gas, water, local authority and commercial sectors in London and the South East. SQS aims to deliver right, first time reinstatement safely and on time. SQS has a widening portfolio of utility services including excavation, replacement and civils works.

SQS has a workforce of around 500, with an established reputation for excellence in customer service, quality and innovation.

SQS currently operates its business in the United Kingdom only.

Our Policy on Modern Slavery and Human Trafficking

SQS have in place a Modern Slavery and Human Trafficking Policy which sets out SQS's action to understand all potential Modern Slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no Slavery or Human Trafficking within its own business and its supply chain.

SQS recognises that it has a responsibility to take a robust approach to Slavery and Human Trafficking and is committed to preventing slavery and human trafficking within its company activities, and to ensure that its supply chain is also free from Slavery and Human Trafficking.

SQS operates the following policies that describe its approach to the identification of Modern Slavery risks and steps to be taken to prevent slavery and human trafficking within its operations

Relevant policies

Whistleblowing policy & Speak up Line

SQS encourages its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chain of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for all workers to make disclosures, without fear of retaliation.

Employee code of conduct

The company's policies make it clear to employees the actions and behaviour expected of them when representing the Company and strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

Supplier Procurement code of conduct

SQS is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. SQS works with suppliers to ensure that they meet the standards of the code and where necessary improve their worker's working conditions. Any serious violations of the company's supplier code of conduct will lead to the termination of the business relationship.

Recruitment / Agency Workers policy:

SQS will only use approved reputable employment agencies if it needs to source labour and will always verify the practices of any new agency it is using before accepting workers from that agency.

SQS uses the following processes to assess whether or not particular activities or countries are high risk in relation to Slavery or Human Trafficking:

- All potential workers undergo a selection process which checks the Right to Work in UK.
- All payments made are equivalent to, or more than the National Minimum Wage (NMW)

Suppliers

Suppliers used by SQS are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. A robust Pre-Qualification Check takes place in the form of a comprehensive Pre-Qualification Questionnaire (PQQ). In addition, SQS works with suppliers to ensure that they meet the standards of the code. If a supplier was found to be in serious violations of the company's supplier code of conduct the business relationship will be terminated.

Due diligence

SQS undertakes appropriate due diligence when considering taking on new suppliers and conducts reviews of its existing suppliers appropriately. In addition, the Company's due diligence includes:

- Evaluating the Modern Slavery and Human Trafficking risks of each new supplier where relevant
- Conducting relevant supplier audits or assessments which have a degree of focus on Slavery and Human Trafficking where and if general risks are identified;

Training/Line Manager briefing

SQS requires its management to be aware of Modern Slavery. The Company's Modern Slavery briefing covers:

- How to assess the risk of Slavery and Human Trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of Slavery and Human Trafficking;
- What initial steps should be taken if Slavery or Human Trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within or how to use the whistleblowing policy

- What steps SQS should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the company's supply chains.

Actions to improve awareness

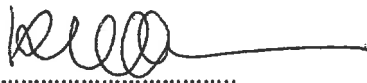
Our policies related to Modern Slavery are reviewed regularly. Continual training and refresher training is delivered to Managers in order to maintain awareness of the Modern Slavery policy.

Performance Indicators

SQS will understand the effectiveness of the steps being taken to ensure that Modern Slavery or Human Trafficking is not taking place across the Company or Supply Chain if there are no reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Executive Directors on 12 November 2018 and will be reviewed annually thereafter.



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Katrina O'Connor
Executive Director