



## Modern Slavery and Human Trafficking Statement

### Introduction

Metnor Group Limited recognises that all businesses have an obligations to prevent slavery and human trafficking and since the implementation of the Modern Slavery Act 2015 we have undertaken a review of our policies and procedures to ensure we are delivering on our responsibilities in this regard.

This statement sets out our commitment to preventing slavery and human trafficking in our business activities and the steps and policies we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains.

We all have a duty to be alert to risks, however small, and staff are expected to report their concerns and management are expected to act upon them.

### Organisation structure, business and supply chains

Metnor Group Limited is the parent company of a number of subsidiary companies which operate across various business sectors. This statement and policy applies to both Metnor Group Limited and the following subsidiaries:

- |                                 |  |
|---------------------------------|--|
| Metnor Construction Limited -   | a building contractor undertaking construction projects at sites throughout the UK.  |
| Norstead Limited -              | a contractor providing mechanical and electrical services and operating in areas such as the health sector, the retail sector and pharmaceutical sector. |
| Metnor Property Group Limited - | a property developer and investor which owns various development sites primarily in the North East of England.   |
| Metnor Great Yarmouth Limited - | a supplier of pressure testing equipment to companies operating mainly in the oil and gas sector.  |

The Group's main business activities are principally undertaken in the UK and our supply chains comprise mainly UK based businesses. Our principal supply chains comprise sub-contractors who provide specialist goods and services to support our main business activities. We also engage with labour agencies to provide additional resources to supplement our own staff.

Moving forward we will expect all employees and members of our supply chain to familiarise themselves with this policy which will be disseminated internally and which will be published on our website.

## **Our Policy in relation to slavery and human trafficking**

We do not permit or condone any form of modern slavery or human trafficking within our business or within our supply chain.

We are committed to preventing any form of modern slavery and human trafficking and to ensuring that members of our supply chain are free from such activities.

If we suspect or identify modern slavery or human trafficking within our supply chain we reserve the right to report such suspicions and to suspend or terminate our relationship with the supplier in question.

We operate the following policies and practices across the business to help identify and minimise the risk of modern slavery or human trafficking occurring:

### ***Own business:***

**Equal Opportunities and Diversity Policy:** This policy sets out the standards of behaviour and actions which all employees are expected to adhere to throughout the business. We seek to provide a work environment where employees are treated with respect, dignity and consideration.

**Corporate Social Responsibility Policy:** This policy sets out how we work responsibly with all stakeholders in the business and how we demonstrate respect for staff, customers, suppliers, the community and the environment as a whole.

**Anti-Bribery Policy:** This policy sets out our zero tolerance approach to bribery and corruption both within our business and our supply chain.

**Whistleblowing Policy:** Our Whistleblowing policy encourages employees to report any concerns related to the activities of the business including any circumstances which may identify risks of modern slavery and human trafficking. The whistleblowing procedure is designed to make it easy for employees to make disclosures without fear of repercussions.

**Recruitment practices:** We endeavour to carry out our own recruitment activities which involves carrying out appropriate background checks and ensuring the strict verification of an individual's right to work in the UK.

**Pay practices:** The rate of pay for our weekly paid operatives is governed by National Agreements which are strictly adhered to. All other employees are paid at rates above the national minimum wage and, where appropriate, the national living wage.

### ***Supply chain:***

#### ***Labour agencies***

We only use registered and reputable employment agencies to source agency labour to supplement our own workforce.

In response to the implementation of the Modern Slavery Act 2015, going forward we will seek written assurances from any organisation supplying agency labour regarding their practices to ensure slavery and human trafficking is not taking place within their business.

### *Sub-contractors*

The appointment of sub-contractors involves an extensive and detailed pre-appointment process which amongst other things, requires written confirmation that sub-contractors will abide by and agree to the terms of this policy.

### **Due diligence processes**

As part of our commitment to ensuring that the risk of modern slavery or human trafficking within our supply chain is mitigated we will undertake the following due diligence procedures:

- New sub-contractors and labour agencies will be asked to supply copies of their Modern Slavery Statements (where they are required to prepare these) and/or to confirm compliance with our own policy.
- Any new members of our supply chain who are based outside the UK will be checked by reference to the Global Slavery Index at <http://www.globalslaveryindex.org/findings/> to assess the status of the country in which they operate and to enable us to assess an appropriate risk level.
- Existing members of our supply chain will be monitored on an ongoing basis to confirm acceptance of and compliance with this policy.

### **Training and awareness**

In order to raise awareness of the issue, we will communicate this policy and statement to all employees to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and in our business.

All directors in the business have been briefed on the subject and we will provide training to relevant members of staff and in particular those responsible for recruiting and those responsible for engaging our supply chain.

### **Board approval**

This statement has been approved by the Board of Directors, who will review it and update it annually.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Metnor Group's slavery and human trafficking statement for the financial year ended 2016.

Keith Atkinson, Managing Director, Metnor Group Limited

11 January 2017