

## **1 MODERN SLAVERY POLICY**

Scott & Ewing Group has a zero-tolerance approach to modern slavery. 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.

S&E Group is committed to:

- Acting ethically and with integrity in all our business dealings and relationships;
- Ensuring that there is no modern slavery or human trafficking in any part of our business and in so far as is possible to requiring our suppliers hold similar ethos;
- 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;
- Ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery, in whatever form is or may be taking place in any part of our own business or in any of our supply chains.

S&E group expects the same high standards from all our contractors, suppliers and other business partners. 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.

This policy applies to all persons working for us or on behalf of the Company in any capacity, including employees at all levels, the Chairman, Managing director, Directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

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

### **1.1 RESPONSIBILITY FOR THE POLICY**

The Chairman and Managing Director have overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those within our organisation and engaged in our business activities comply with it.

The Chairman has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and together with the HSEQ Manager auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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.

## **1.2 COMPLIANCE WITH THE POLICY**

You must ensure that you read, understand and comply with this policy.

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 engaged in our business activities. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your Department Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

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.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your Department Manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure 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 Department Manager.

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 your Department Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## **2 COMMUNICATION AND AWARENESS OF THIS POLICY**

This policy, and 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.

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.

## **3 BREACHES OF THIS POLICY**

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

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



## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **OUR COMMITMENT**

*S&E Group has a zero-tolerance to Modern Slavery and Human Trafficking, we are committed to:*

- *Acting ethically and with integrity in all our business dealings and relationships;*
- *Ensuring that there is no modern slavery or human trafficking in any part of our business and in so far as is possible to requiring our suppliers hold similar ethos;*
- *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;*
- *Ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery, in whatever form is or may be taking place in any part of our own business or in any of our supply chains.*

### **OUR BUSINESS AND STRUCTURE**

*S&E Group companies specialising in providing building, civil engineering and mechanical services, with the group head office in Omagh Co. Tyrone.*

### **OUR SUPPLY CHAINS**

*We expect all those supply chain to comply with our company values with regards to modern slavery and human trafficking ensuring a zero tolerance is maintained across all levels in the chain.*

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

*S&E group is committed to ensuring that there is no modern slavery or human trafficking in any part of our business and in so far as is possible to requiring our suppliers to ensure the same. We have in place the following policies which are relevant to identifying the risks and protecting those who are at risk of or who have highlighted a potential risk of slavery or trafficking:*

- *Anti-Bribery and Corruption Policy*
- *Whistleblowing Policy*
- *CSR Policy*

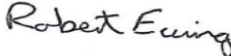
### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

- *We evaluate the risks of each new supplier*
- *We assess the increase in risk based on the Geographical location of each project we undertake*
- *We review all aspects of our supply chain on a regular basis*

### **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 ensure all existing employees are fully apprised of our policy, for all new employees it is part of the induction process and that further training is given to those within our business or supply chain where there may be an increased exposure to any risks.*

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2019.

Signed   
Robert Ewing (Director)

Date 29<sup>th</sup> Nov 2022