

A) ORGANISATION

This statement applies to Concept Building Services (Southern) Ltd (referred to in this statement as 'CBS'). The information included in the statement refers to the financial year 2019/2020.

B) ORGANISATIONAL STRUCTURE

CBS works predominately across England and Wales. The company operates on a regional basis and overall control is served by the main office which is located in Midhurst. Local regions are served by further offices located in Exeter, London, Southampton, Portsmouth, Worcester and Darlington. The company also operates a small division which services our global clients, these operate from the London and Midhurst offices.

CBS undertakes contract construction and civil engineering projects across the regions established above. Each office undertakes mainly construction and refurbishment projects, a small civil engineering division undertakes projects across the England & Wales regions which is based at the Portsmouth office. Similarly, a small contracting electrical division is located within the Southampton office

Work is carried out on a client lead, project specific, contractual basis across the regions. This means that project locations are highly transient, and include projects overseas. Therefore, the labour supplied to CBS in pursuance of its operation is carried out mainly across England and Wales but does include other countries across the world.

C) DEFINITIONS

CBS considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

CBS acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. CBS understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

CBS does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to CBS in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. CBS strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, and in many cases exceeds those minimums in relation to its employees.

E) SUPPLY CHAINS

In order to fulfil its activities, CBS' main supply chains include those related to the supply of construction materials and labour. These are sort predominately within the UK and therefore are subject to UK legislation. Operating overseas means that some of our supply chain is made up of local materials and labour, however this is highly dependent on client requirements, availability of local skills and quality of local materials. All of our UK Supply chain are required to sign a code of conduct which sets out CBS' core values and standards of behaviour. The code is in line with and exceeds the current legislative compliance and moral societal thinking. Our supply chain is in essence fluid as it changes upon what region, office or project is covered, and additionally on occasion our supply chain is prescribed by the client's request. We constantly monitor our supply chain through supply chain audits and management performance reviews.

F) POTENTIAL EXPOSURE

CBS considers its main exposure to the risk of slavery and human trafficking to exist from imported construction materials from sources outside the UK and EU, through suppliers where CBS undertakes work along with its overseas construction works, particularly in developing countries. It is recognised that this is a sector that is more likely to engage in this type of practice and countries outside of the UK are potentially more likely to partake in slavery/human trafficking issues as protection against breaches of human rights may be limited.

In general, CBS considers its exposure to slavery/human trafficking to be relatively limited, nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Version Number:	2.0	CONTROLLED DOCUMENT UNCONTROLLED WHEN PRINTED OR DOWNLOADED	Page:	1 of 2
Document Name:	HR 023		Issue Date:	13/02/20
Revision Date:	13/02/20			

G) STEPS

CBS carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

CBS has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, CBS has taken the following steps to ensure that modern slavery is not taking place:

- Board level commitment to the implementation of the Modern Slavery and Human Trafficking policy
- The supplier approval process will incorporate a review of the controls undertaken by them prior to them being included on the preferred suppliers list
- Monitoring as part of the Contractor Assessment process and when working overseas as part of the Contractual arrangements agreed
- Zero tolerance, CBS will not support or deal with any business knowingly involved in slavery or human trafficking
- Developing and implementing codes of conduct in line with CBS values and societal moral values
- Providing training, posters, awareness material and guidance on recognising modern slavery
- Working with overseas clients who share similar values to evaluate local labour and material suppliers
- Carrying out supply chain audits
- Implement and embed an open door speak up philosophy throughout the business

H) KEY PERFORMANCE INDICATORS

CBS has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in CBS or its supply chains.

- Zero occurrences of modern slavery through supplier audits
- All staff trained in modern slavery
- Internal audit findings

I) POLICIES

CBS has the following policies which further define its stance on modern slavery

- Ethical Purchasing Policy Statement
- Subcontractor & Supplier Code of Conduct
- Recruitment and Selection Policy
- Modern Slavery and Anti Trafficking Policy Statement

J) TRAINING

CBS provides the following training to staff to effectively implement its stance on modern slavery.

Initial Training is via company induction, review and the staff handbook.

Ongoing training is undertaken in the form of toolbox talks, awareness posters and supply chain school videos.

<https://www.supplychainschool.co.uk/default/modern-slavery.aspx>

<https://www.supplychainschool.co.uk/uk/fir/construction/default.aspx>

We also download a variety of posters in various languages from the Government website.

<https://www.gov.uk/government/publications/modern-slavery-closer-than-you-think>

K) SLAVERY COMPLIANCE OFFICER

All employees, sub-contractors and suppliers for CBS act as Slavery Compliance Officers, all concerns regarding modern slavery should be addressed via email to the CBS compliance team at compliance@conceptbld.co.uk, who will then undertake relevant action with regard to CBS obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: 13th February 2020

Signed: 

Daniel Small
Director

Date: 13th February 2020

Version Number:	2.0	CONTROLLED DOCUMENT UNCONTROLLED WHEN PRINTED OR DOWNLOADED	Page:	2 of 2
Document Name:	HR 023		Issue Date:	13/02/20
Revision Date:	13/02/20			