



# Modern Slavery Statement

This voluntary statement sets out Kelbec Civils Ltd actions 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 in its own business and its supply chains.

As part of the construction industry, the company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Company structure and supply chains

This statement covers the activities of Kelbec Civils Ltd Ltd:

Kelbec Civils Ltd was founded in 2000 as a civil engineering company specialising in highways related civils and public realm improvements, mainly for local authorities. Over the past 18 years the firm has diversified and moved into specialist areas of construction, refurbishment and maintenance across the Midlands.

We only use subcontractors and suppliers who have been accepted onto our Company Supply Chain which we have operated since 2008. We are CHAS Accredited and registered with Constructionline, a UK government owned pre-qualification service for construction related contractors, consultants and material suppliers, and has been developed to reduce duplication in the pre-qualification process.

## Countries of operation and supply

The Company currently only operates in the United Kingdom.

## Areas of Concern

The following activities are considered to be at low risk of slavery or human trafficking:

- The use of agency workers for labour intensive activities
- Subcontractor packages with high labour content

## Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows:

- Policies: The senior management team is responsible for putting this policy in place. In order to do so, the company has reviewed all processes in its supply chains and sought information from suppliers where relevant. The H&S Director is responsible for reviewing this policy annually.
- Risk Assessments: The responsibility for human rights and modern slavery risk analysis lies with the directors responsible for each division within the company.
- Investigations/due diligence: the senior management team is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- Training: Awareness training and employee responsibilities training will be carried out by the H&S Director, supported by the Contracts Manager.

## Relevant Policies

The Company 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 in its operations.

- Whistleblowing Policy: The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the

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Company. 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 workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can speak to any of the Directors.

- Employee Code of Conduct: The Company's rules of conduct makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- Supplier/Procurement code of conduct: The Company 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. The Company works with suppliers to ensure that they meet the standards of the code and improve their workers working conditions. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.
- Recruitment Policy: The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

**Due Diligence**

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new suppliers [this may be part of a more general human rights or labour rights assessment];
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- Conducting supplier audits or assessments through [the Company's own staff/third party auditor], which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- Creating an annual risk profile for each supplier;
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

**Performance Indicators**

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is:

- Requiring all staff to have completed training on modern slavery by 31st October 2018;
- Developing a system for supply chain verification whereby the Company evaluates potential suppliers before they enter the supply chain; and
- Reviewing its existing supply chains, whereby the Company evaluates all existing suppliers.

**Training**

The Company requires staff within the Company to complete training on modern slavery. The Company's modern slavery training covers:

- Our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged

on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.

- 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 the Company
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters & Labour Abuse Authority and the "Stronger Together" initiative.
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps the Company 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.

This Policy applies to all employees, self-employed and to all applicants for employment.

We will circulate this equality policy to all workers by enclosing copies in induction packs and making available in employee accessible areas of the company server. We will train our managers in equality and the law on equality of opportunity, discrimination, harassment and victimisation.

I, as Director appointed for compliance, shall review the effectiveness and adequacy of this policy on an annual basis and following any changes to company activity, legal changes or equality incident.

Ultimate responsibility for compliance and performance is held by Managing Director Rodney Cockette.

Signed on behalf of Kelbec Civils Limited:



**Stuart Kirby**

**H&S Director, 17 September 2020**