



Anti-Slavery and Human Trafficking Statement – (3) **(For the period 01.01.18 – 31.12.18)**

Introduction

Buckingham Group's slavery and human trafficking statement is made pursuant to Section 54 of the Modern Slavery Act 2015 'Transparency in Supply Chains' and was approved by the Board of Directors and signed by Mr Mike Kempley, Group Managing Director, on 5th March 2019.

The statement will be updated annually.

Over and above the requirements of the Modern Slavery Act, we endorse the tenets of the Global Compact principles, International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the Ethical Trading Initiative 'Base Code'.

We ensure that employment is chosen freely, freedom of association is respected, working conditions are safe and hygienic, child labour is not used, wages are not lower than the minimum wage, working hours are not excessive, no discrimination is practised, regular employment is provided, and no harsh or inhumane treatment is allowed.

Summary

The steps we have taken over the past 12 months to reduce the risk of Modern Slavery and Human Trafficking include:

- Providing ongoing training for our Staff via e-learning modules provided by the Supply Chain Sustainability School
- Our integrated suite of policy statements has been reviewed and updated to reinforce our zero-tolerance approach to any form of slavery and human trafficking including the use, in any form, of forced labour
- The terms and conditions under which we engage our suppliers and subcontractors have been revised to include key terms reinforcing the requirement of our supply chain to visibly comply with the Modern Slavery Act, adopt our same zero-tolerance approach and demand the same expectations from their suppliers
- Our management systems have been enhanced by the development and implementation, with associated briefings and coaching, of Group Procedure, 'GP.2014 Right to Work, National Minimum/Living Wage & Modern Slavery Act Compliance Checks'. Further improvements have been made to the recording and monitoring of data provided by our supply chain

Outcome – 2018

Within our second annual statement, following a specific risk assessment of our business and the projects we deliver, we stated that the risk of risk of slavery or human trafficking occurring within Buckingham Group's operations, direct employee population, or contract staff and suppliers/subcontractors under our direct supervision, to be low.

We confirm that through 2018 there were no record instances, or any issues raised relating to slavery or human trafficking in any part of our business operations or, to the very best of our knowledge within any of our suppliers or subcontractors.



1 - Company Overview

1.1 Introduction

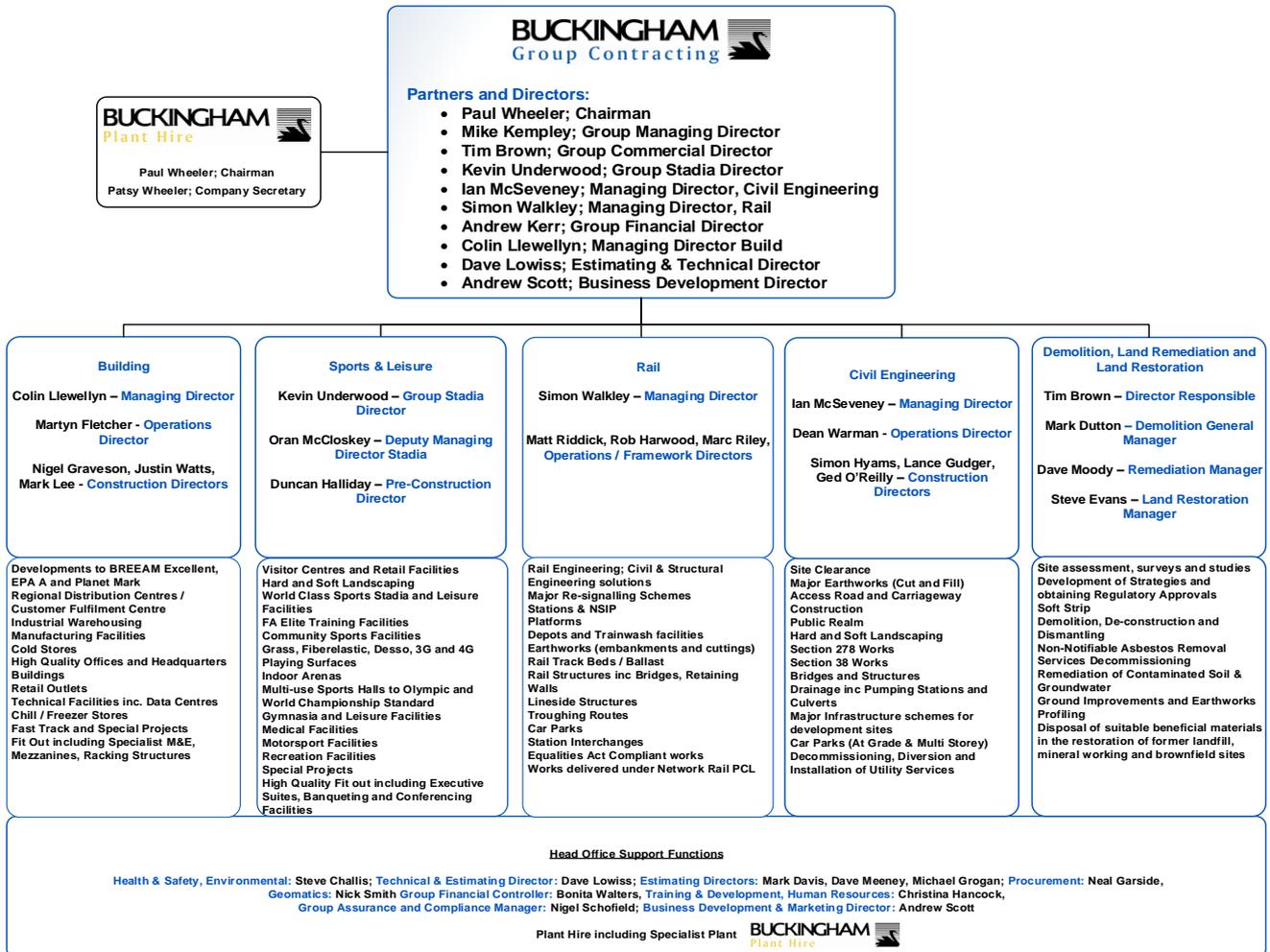
Buckingham Group Contracting Ltd (Buckingham Group) was formally incorporated in November 1987. The company has since grown organically to become a well-established Principal Contractor, undertaking major, multi-disciplinary, construction projects.

As an owner-managed business, Buckingham Group maintains a business ethos based on traditional "family values". The company cares about their staff, the communities in which they operate and takes pride in the projects that they deliver. The company retains and develops high-calibre, directly employed, staff across all disciplines, with a strong, in-house production capability in demolition, civil engineering, earthworks and land remediation/restoration.

The company has the senior management structure and staff resources in place to achieve the objectives and targets in their business plan via a regularly reviewed, and effectively communicated, strategy.

1.2 Buckingham Group's Organisational Structure

During the year ending 31st December 2018, the average number of staff and employees increased to approximately 535. Buckingham Group's Head Office is located at Stowe in Buckinghamshire and the company has regional offices in Warrington, Manchester, Birmingham, Doncaster, Bristol and London.





1.3 Buckingham Group's business operations

Buckingham Group Contracting Ltd undertakes construction projects solely within the UK and Ireland.

The company's operations are defined by the scope stated on our formal ISO/BS/OHSAS Health & Safety, Environment, Quality and Energy management certificates as:

The management of design and construction works in the building, civil engineering, demolition, land remediation, land restoration, sports and leisure, and rail sectors

1.4 Buckingham Group's Supply Chains

Buckingham Group is committed to providing a safe, diverse, efficient, integrated and sustainable organisation, which reflects all segments of the community in our operations and relationships. Our supply chain approach is open, flexible and deals with a mix of local/national/SME/BAME suppliers. Our supply chain comprises the engagement of capable, regulated, agencies, suppliers and subcontractor organisations to carry out works and services on our construction sites and the sourcing of materials and manufactured products. We are committed to ensuring that slavery and human trafficking plays no part in our supply chain or any part of our business.

Although we are a 'Large Business' we operate with a relatively small, stable, and well-managed, supply chain. In many instances our key supply chain partners have worked with us, in mutually beneficial relationships, for periods extending over 25 years. Notwithstanding this fact, prior to engaging and entering into formal contracts, our supply chain is required to confirm their compliance with the Modern Slavery Act and confirm that they have undertaken 'Right to Work' checks on their employees. This approach is further cascaded down to Tier 2 and Tier 3 suppliers and beyond.

Our strategy for Supply Chain Management is founded on the premise that improving company and project performance depends on jointly improving performance with our Suppliers. Inherent in this process is the selection of organisations with whom we develop close working relationships to deliver continual improvement and develop mutually beneficial partnerships. Our Supply Chain Management strategies are based on:

- Selecting subcontractors who are Constructionline / RISQS Registered (minimum/mandatory requirement) who can demonstrate the relevant skills, experience and capability (CDM 2015 Compliance) and have a demonstrable, very good, HSEQ performance record
- Ensuring, via the application of GP.2014 that our suppliers / subcontractors have taken the necessary steps to comply with the Modern Slavery Act, undertaken Right to Work checks on all of the people they intend to use on our projects and pay in excess of the minimum wage including local agreements and / or the Living Wage

Buckingham Group actively manages its relationships with our supply chain. There are clear contractual arrangements in place with all direct suppliers, who are required to sign up to our Standard Terms & Conditions.

1.5 Complexity of supply chains

The clear majority of the works undertaken by Buckingham Group can be considered as traditional, design and build or construct only building and civil engineering projects. Our supply chains can be classified as:

- Simple - single supply of bulk goods and commodities e.g. aggregates, concrete etc.
- Simple – but for complex services e.g. architectural, structural, civil design etc.
- Simple – via a tier one supplier directly installing fabricated materials e.g. Structural Steel, Cladding, Glazing etc.



- Straightforward – via tier one suppliers who may sub-contract part of their installation to a tier 2 supplier but remain responsible for that tier 2 supplier
- Complex – representing less than 5% of our works operations involving key services such as complex Mechanical and Electrical installations whereby core components can be sourced globally via multiple tiers in the fabrication of major components. In all cases these complex elements of our works are procured via reputable, industry recognised, UK based, specialist contractors

1.6 The Countries we source goods and services from

With reference to section 1.4, goods and services are sourced from:

- UK only, circa 90%
- Outside of the UK but within the European Union, circa 9%
- Outside of UK and the European Union circa 1%

All materials shall be sourced responsibly in line with our Corporate Social Responsibility, Corporate Environmental Policy, Corporate Sustainability and Sustainable Development Policy and Ethical Trading Policies that confirm our commitment to the consideration of environmental, sustainability, social and ethical factors during material selection and procurement.

Buckingham Group does not operate in countries where a legal minimum wage has not been set. The instances under which we procure goods from such countries (directly or via 3rd parties) are very rare.

We will source materials by purchasing products provided by Suppliers and Sub-contractors who can demonstrate their ability to comply with this policy and Client specified requirements. To ensure that suppliers procure goods from reputable, recognised suppliers in their country of origin the following, reasonable, steps are taken:

- Suppliers are required to provide relevant certificates of conformity including agreement certificates
- Import certificates / licences confirming country of origin if appropriate

2 - Policies in relation to Anti-Slavery and Human Trafficking

Introduction

Buckingham Group is committed to maintaining the highest of standards of Corporate Social Responsibility in our business activities. We recognise that we have an integral responsibility for all matters of general concern to the society in which we operate and to all our own, and society's stakeholders. This responsibility is demonstrated through our actions and within our comprehensive suite of corporate policies, processes and procedures supported by Directors and Senior Managers.

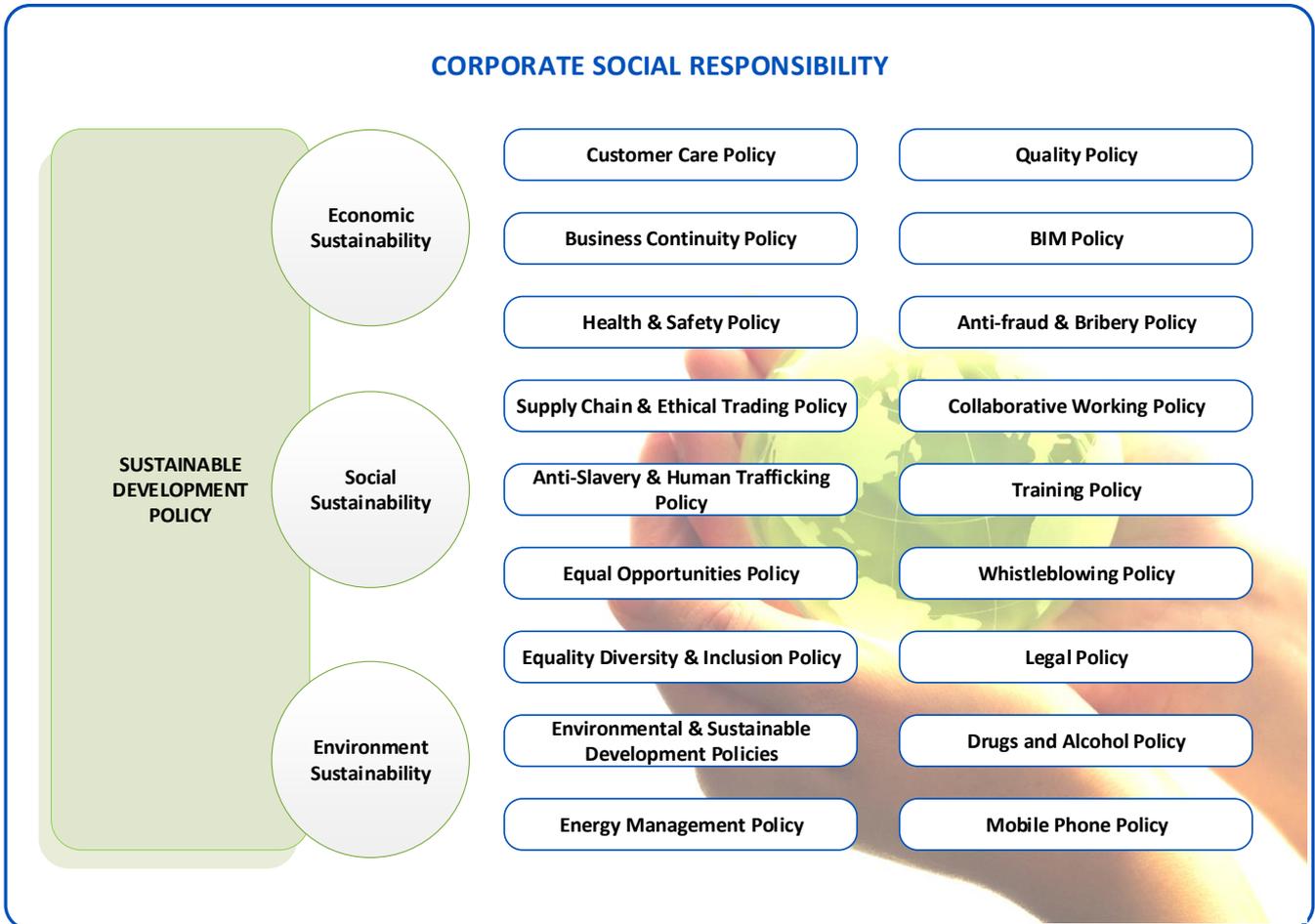
The safe, effective, fair and robust management of our supply chain is governed by the application of the following formal, integrated, policy statements:

- Corporate Social Responsibility Policy
- Health & Safety, Environmental & Sustainable Development, Quality Policy Statements
- Anti-Slavery and Human Trafficking Policy
- Equal Opportunities, Equality and Diversity Policy Statements
- Ethical Trading Policy
- Anti-Fraud and Bribery Policy
- Whistleblowing Policy, plus systems and procedures to encourage the reporting of concerns and the protection of whistle blowers, reference our Whistleblowing Policy statement and associated Group Procedure GP.HR4011 Whistleblowing



Corporate Policies

The following diagram highlights the interaction and inter-relationships between our Corporate Social Responsibility Policy which defines our vision and values, our Sustainability Policy and all other policies in force within our company:



Policy Review

Buckingham Group’s Policies are reviewed, as a minimum, on an annual basis. The review will be undertaken in compliance with Group Procedure GP.1001 Management Review that sets out the arrangements for review of the Buckingham Group Integrated Management System to ensure its continuing suitability, adequacy, effectiveness and alignment with the strategic direction of the company.

Additional reviews are undertaken throughout the year subject to:

- Further changes in the published, or similar aligned, legislation (Ref. Group Procedure GP.1003 Evaluation of Legal Compliance)
- As a result of issues raised by regular Internal and third-party audits
- Following any investigation into issues or concerns raised by our staff, employees, subcontractors, suppliers plus other interested third parties
- The results of monitoring, audit and review of our existing aligned policies and our formal ISO9001 Group Procedure ‘GP.2014 Right to Work, National Minimum/Living Wage & Modern Slavery Act Compliance Checks’



3 - Due Diligence Processes

We have a long-established set of policies and procedures, see sections 1.4 and 2, above, covering the standards we expect from our supply chain. We enforce our policies and procedures to ensure that slavery and human trafficking is not taking place anywhere in our businesses or within our supply chains.

Recruitment

We carry out appropriate checks to ensure that any new applicant is suitable for the role that they have applied for. Prior to making an offer, we ensure that all applicants are aware of the background and 'Right to Work' checks that we will carry out. We only make Job offers subject to and following the satisfactory conclusion of vetting procedures.

All of our people undergo identity and 'Right to Work' checks prior to commencing employment. We also carry out reference checking and, where applicable, DBS checks. We employ most of our people directly or on a fixed term basis with checks in place to ensure that payment of salary is direct to that person. In addition to complying with legislative requirements, we carry out additional background checks on a risk basis, either through our own assessment or one carried out in conjunction with our Clients.

Supply Chain

For Sub-contractors and Agency Employers the Buckingham Group Employing Manager should ensure they provide a copy of their latest annual anti-slavery and human trafficking statement/ evidence that their annual turnover is less than £36m. **Form GP.2014.F03 Modern Slavery Act Check**, is to be completed by all suppliers / subcontractors prior to contracts being awarded. The completed form should contain the **original signature** of the person signing on behalf of the Sub-contractor/ supplier (not a photocopy). The original is to be retained on site and a copy forwarded to Head Office for the attention of Andrew Scott, Business Development Director.

Whilst the completion of the form by the Sub-contractor/ supplier goes part way to satisfying Buckingham Groups obligations in respect of the Act, the following measures need to be addressed where appropriate:

- Some construction sites, such as those in and around major cities (in particular London) carry a greater risk of cases involving modern slavery arising
- Some sub-contractors / suppliers may have supply chains that source materials, components and products etc. from countries that have a high prevalence of modern slavery (e.g.: Mechanical and Electrical). These countries include the likes of India and Pakistan when considering proportion of the population and additionally China and Bangladesh when considering absolute numbers of people (<http://www.globalslaveryindex.org/findings/>). Evidence should be sought from the Sub-contractor / supplier indicating what specific measures they have put in place to tackle this problem

4 - Assessment of the Risk of Slavery or Human Trafficking taking place

We have, applying our formal Risk Assessment and Management Processes, (Group Procedure, GP.2009 Risk Management), undertaken an assessment of slavery and human trafficking risks within Buckingham Group's own operations, office and construction sites. In undertaking this risk assessment, we considered:

- The location of our operations (Offices and Sites)
- The nature of works being undertaken
- The workforce delivering the works (In-house and Subcontract)
- Recruitment and Right to Work processes
- The absence to date of any reports or concerns regarding slavery and human trafficking

As well as direct employees, Buckingham Group has agency & contract staff plus subcontractors working at our sites. Contractual terms and conditions are in place with the companies that provide Buckingham Group with agency staff, requiring them to have a process in place to protect human rights.



Based on our risk assessments, we deem the risk of slavery or human trafficking occurring within Buckingham Group's direct employee population, or our agency/contract staff and subcontractors under our direct supervision, to be low.

Parts of the Business and supply chains where there is a risk of Slavery or Human Trafficking taking place:

- The occasions when security, cleaning and catering services are procured
- Where we operate outside of our normal geographic region and procure new suppliers / sub-contractors
- Where we work in city centre locations

5 - Effectiveness of the measures taken to stop Slavery and Human Trafficking taking place

Our Policies, procedures and contractual terms are clear on the need to protect human rights. However, we recognise that these measures can only give a limited degree of comfort that slavery and human trafficking are not occurring within our Tier One and regularly used Supply chains. We will continue to develop our approach, systems and procedures to mitigate the risks of slavery and human trafficking occurring in lower tier of our supply chain.

A natural consequence of the Risk Management process is the identification of high risk projects / high risk supply chains should these be identified we will assess whether or not further targeted auditing of selected suppliers is deemed necessary to mitigate a higher slavery risk.

We confirm that through 2017 there were no record instances, or any issues raised relating to slavery or human trafficking in any part of our business operations or, to the very best of our knowledge within any of our suppliers or subcontractors.

6 – Statement regarding Awareness & Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, Buckingham Group:

- Has ensured that all Directors and Senior Managers have been briefed on the subject and provided with information and details regarding the actions we have taken and are planning to take in the future
- Has provided training for our Staff via e-learning modules provided by the Supply Chain Sustainability School
- Ensures that awareness training about slavery and human trafficking is available to all relevant employees via the implementation, with associated briefings and coaching, of Group Procedure, 'GP.2014 Right to Work, National Minimum/Living Wage & Modern Slavery Act Compliance Checks'
- Makes all new employees aware of the Policy Statement, (Plus all additional supporting and related policies) upon commencement of employment
- Has engaged our top tier supply chain partners within our Behavioural Safety Programme via Director led engagement days, this specifically includes coaching training and awareness of the Respect Agenda, that is a key foundation of the programme

Signed:

Dated: 5th March 2019

Signature redacted for security purposes

Mr. M. T. Kempley; Managing Director