

## Policy Statement

This statement sets out the steps CEMA Group has undertaken, and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

The organisation has a zero-tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings.

We are committed to creating effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain and impose the same high standards on our contractors, suppliers, and other business partners.

## Purpose

Slavery and human trafficking remain a hidden blight on our global society, and we all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

## Forms of modern slavery

Modern slavery takes many forms. The most common are:

- **Human trafficking.**  
The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal.
- **Forced labour.**  
Any work or services people are forced to do against their will under threat of punishment.
- **Debt bondage/bonded labour.**  
The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt.
- **Descent-based slavery.**  
Most traditional form, where people are treated as property, and their "slave" status was passed down the maternal line.
- **Slavery of children.**  
When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery.
- **Forced and early marriage.**  
When someone is married against their will and cannot leave. Most child marriages can be considered slavery.

People end up trapped in modern slavery because they are vulnerable to being tricked, trapped, and exploited, often as a result of poverty and exclusion. It is these external circumstances that push people into taking risky decisions in search of opportunities to provide for their families or are simply pushed into jobs in exploitative conditions.

## Scope

### The policy

### Organisation's Structure

The organisation are a supplier of MCC, and electrical installation services and a division of CEMA group structure. The group has its head office in Nottingham, UK, and all trading outlets are in the UK. The group has an annual turnover of around £30m plus, so is not liable to reporting under Section 54 of the Modern Slavery Act 2015. However, it is the stated intention of the company to comply, nonetheless.

## Our Supply Chains

Our supply chains include the sourcing of steel work, LV switchboard , utilising the following:

- Functional Design
- Original Equipment Design Drawings (CAD)
- Control Equipment Manufacture
- System Design and Software Development
- Pre-commissioning prior to inspection
- Client Inspection and Factory Acceptance
- Installation at the Client's Premises
- Process and System Commissioning
- Operator/Maintenance Training
- Complete Documentation
- Warranty and on-going support

## Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk -

- Where practicable, we source all materials from recognised UK pre-vetted sources.
- We limit the geographical scope of our premises to ensure optimum supervision of the use of our properties;
- Where possible we build long standing relationships with local suppliers and customers and make clear our expectations of business behaviour;
- With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We expect each entity in the chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us and every other participant in the chain) to have a direct relationship with all links in the chain, ultimately to the field or utility generator.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

### • Our categories

• Our supply chains mainly fall under 4 categories, which are:

- • Labour
- • Sub- Contractors
- • Suppliers of equipment and services
- • Supplier of parts

• We are committed to ensure that:

- • Employment is freely chosen;
- • Freedom of association and the right to collective bargaining are respected;
- • Working conditions are safe and hygienic;
- • Child labour shall not be used;
- • Living wages are paid;
- • Working hours are not excessive;

- No discrimination is practised;
- Regular employment is provided; and
- No harsh or inhumane treatment is allowed.

## Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values. We require our suppliers to complete an annual supplier questionnaire with associated documentation to ensure their process comply with anti-slavery and human trafficking.

## 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 provide awareness training to relevant members of staff. All Directors have been briefed on the subject.

## Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of suitable audits
- Use of labour monitoring; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

## Our plans for the future

As part of this reporting exercise in this and the coming years, the organisation expresses its commitment to the abolition of modern slavery, human trafficking, forced and bonded labour and labour rights violations.

This Statement has been approved and published by the CEMA Group Board and will be reviewed at least once annually. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's Slavery and Human Trafficking statement for the current financial year.

## Communication

The policies, and with them the objectives are communicated internally and externally to personnel, customers and interested parties through the issuing of the employee handbook, completion of supplier questionnaires, and through the displaying of policies on noticeboards and the organisations website.

## Statement of objective framework:

The policies are reviewed annually to ensure new issues or requirements are addressed and actioned based on current legislation and statutory guidance.

Document approved by  
Graeme Morley, CEMA Group Director



Ross Hill, CEMA Group Director

