

Modern Slavery Statement

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers, including children. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

SW Bruce has a zero-tolerance approach to modern slavery and is dedicated to acting ethically and with integrity and transparency in all of its business dealings and relationships.

We are committed to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere, within either our own business or in any of our supply chains, consistent with our obligations under the Modern Slavery Act 2015.

This statement outlines our commitment and actions taken to address these issues.

1. Organisation Structure & Supply Chains

Organisation

We deliver a comprehensive range of fabric, mechanical and electrical, project and maintenance services to public and private sector clients across London and the South-East.

Our broad range of skills, combined with our marked ability to react, provides us with true diversity in our customer base – with projects that span from planned and reactive maintenance of public sector premises to full multi-disciplinary refurbishments of critical buildings.

The business operates through SW Bruce & Co. Ltd, which is the primary subsidiary of its UK holding company, SWB Holdings Ltd.

Supply Chain

We source a range of suppliers to support our business. The majority of our supply chain members are long-serving suppliers.

Our relevant suppliers include; specialist subcontractors, labour-only subcontractors, building materials suppliers, office materials and energy/fleet-related suppliers, accountants, banks and insurers.

We maintain due diligence records of our subcontractors and key suppliers. Contractors do not subcontract without our permission.

2. Policies in Relation to Slavery & Human Trafficking

We maintain an Anti-Slavery and Human Trafficking Policy, developed in accordance with the Modern Slavery Act 2015. This applies to all our personnel.

Our policy sets out our zero-tolerance approach to modern slavery and our commitment to acting ethically and with integrity and transparency in all of our business dealings and relationships. It also describes our obligation to implement and enforce effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either our own business, or in our supply chains.

Our Anti-Slavery policy is underpinned by our Whistleblowing, Ethical Trading, Labour Standards and Vulnerable Persons policies.

3. Due Diligence Processes

We apply strict due diligence processes when selecting and onboarding suppliers and subcontractors. We require them to adhere to our anti-slavery principles and to comply with relevant laws and regulations.

Our processes include:

- Working with long-serving, known, suppliers whose values are aligned with ours and who are committed to anti-slavery
- Seeking confirmation from new suppliers that they are in compliance with our with anti-slavery policy

4. Risk Assessment & Management

We recognise that there is, within our construction sector, a higher risk of slavery and human trafficking in our supply chains, e.g.:

- the potential use within the industry of low paid, migrant labour and agencies
- suppliers of construction materials from countries with high unemployment and/or weaker labour laws and/or enforcement

We conduct periodic risk assessments of our business and supply chains to identify any areas vulnerable to modern slavery and human trafficking. Where these are identified, we take the necessary steps to mitigate and eliminate these risks.

5. Key Performance Indicators to Measure Effectiveness of Steps Being Taken

To monitor the success of our initiatives, we capture the below Key Performance Indicators. The results are reviewed periodically by our directors. Remedial actions are taken if any anomalies are identified.

- % of relevant employees trained
- % Key existing supplier commitment
- % New supplier commitment
- % of identified instance of modern slavery and labour exploitation remediated

6. Training On Modern Slavery & Trafficking

Regular, certificated, online CPD training on modern slavery is provided to relevant members of staff, enabling them to identify exploitation and modern slavery and how to report suspected cases. Whistleblowing channels are available to staff to facilitate reporting without retaliation.