

## Modern Slavery Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

CB Services Group ('the Company') is not currently required by law to publish a modern slavery statement under section 54 of the Modern Slavery Act 2015, but we are making this voluntary statement to convey our ethical trading principles and to set out the steps we are taking to identify risks and that ensure modern slavery and human trafficking is not taking place anywhere in our own business or in our supply chain. Our supply chains include providers of labour and materials, and professional services.

This policy applies to all persons working for the company or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, contractors, external consultants, and business partners.

## Organisational Structure

The main activities carried out by the Company are the provision of electrical, fire safety, compliance, eco and security services. Our clients include social housing providers, local authorities, educational and healthcare providers, and commercial businesses. The business operates from its main offices in Brentwood, Essex and it is from there that the business is controlled and directed. The Company operates only in the United Kingdom and the labour supplied to the Company in pursuance of its operations is carried out in wholly in the United Kingdom.

The Directors have overall responsibility for ensuring that the Company complies with its legal and ethical obligations, that this policy remains fit for purpose and that all those under our control comply with it.

The Directors also have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## Potential exposure

The Company's supply chain consists of third-party suppliers, contractors, and sub-contractors on whom the Company relies on to provide its services. The suppliers vary in size from larger businesses to individual tradesmen.



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The Company considers its main exposure to the risk of modern slavery and human trafficking to exist in using suppliers which are smaller businesses and not required in law to comply with the Modern Slavery Act 2015.

To alleviate such risk the Company has put in place centrally managed procurement processes, which involves conducting appropriate due diligence when engaging suppliers and procuring materials. Anti-slavery and human trafficking provisions are included in our contracts with suppliers where appropriate.

In general, the Company considers its exposure to modern slavery and human trafficking to be relatively limited. 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. These steps include:

- Regular review of supplier contracts to include termination powers in the event that the supplier is, or is suspected, of being involved in modern slavery.
- Communicating this policy to those working with the Company to ensure awareness and to embed a zero-tolerance policy towards modern slavery.
- Implementing training for managers engaged in recruitment and the appointment of suppliers.
- The provision of 'toolbox talks' to employees to make them aware of modern slavery and human trafficking and their reporting obligations.

## **Key Performance Indicators**

The Company has set the following Key Performance Indicators to measure its effectiveness in ensuring modern slavery is not taking place in the business or its supply chain:

- Number of reports received from employees, the public or law enforcement agencies to indicate that modern slavery has been identified or associated with the Company.
- Number of reports received from within the Company's supply chain to indicate that Modern Slavery has been identified.

The Company has, to date, not received any such reports from employees, the public, law enforcement agencies or our supply chain to indicate that modern slavery practices are taking place.

## **Responsibility of employees**

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the Managing Director. You must ensure that you read, understand, and comply with this policy. You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are required to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it immediately.

If you are unsure about whether an act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, you must raise it with your manager.

The Company aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Health, Safety and Environmental Director immediately. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

### How to spot the signs of Modern Slavery

<b>Manner</b> <ul style="list-style-type: none"> <li>Reluctant to seek help</li> <li>Avoids eye contact</li> <li>Appears frightened to talk</li> </ul>	<b>Appearance</b> <ul style="list-style-type: none"> <li>Signs of physical or psychological abuse</li> <li>Looks under-nourished or unkempt</li> <li>Appears withdrawn</li> </ul>	<b>Time</b> <ul style="list-style-type: none"> <li>Unusual travel times</li> <li>Works excessive hours</li> <li>Dropped off/collected for work on a regular basis, either very early or late at night</li> </ul>
<b>Living conditions</b> <ul style="list-style-type: none"> <li>Living in dirty, cramped or overcrowded accommodation</li> <li>Living and working at the same address</li> </ul>	<b>Possessions</b> <ul style="list-style-type: none"> <li>Has no travel documents or passport</li> <li>Has few or no personal possessions</li> <li>Always wears the same clothes</li> <li>Clothes not suitable for work</li> </ul>	<b>Isolation</b> <ul style="list-style-type: none"> <li>Restricted freedom of movement</li> <li>Rarely allowed to travel alone</li> <li>Seems under control of others</li> <li>Rarely interacts</li> </ul>

### Policies

The Company has the following internal policies which further define its stance on modern slavery and require that the Company conducts its business in an ethical and transparent manner:

- Corporate Social Responsibility Policy
- Whistleblowing Policy
- Equality & Diversity Policy
- Bullying & Harassment Policy

This voluntary statement is made in pursuance of Section 54 of the Modern Slavery Act 2015 and will be reviewed each financial year. This statement constitutes the Company's modern slavery statement for the financial year ending 31<sup>st</sup> March 2024.

Signed:



Charlie Brown  
Managing Director

Date issued: 31<sup>st</sup> March 2024 | Review Date: 1<sup>st</sup> March 2025