



# ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and constitutes Knights Brown's anti-slavery and human trafficking statement for the financial year beginning April 2020. The statement was approved by the board of directors in March 2021.

## INTRODUCTION

We all have a responsibility to be alert to the risk and potential for forms of modern slavery in our business and wider supply chain. All employees are expected to follow the guidance outlined in our Anti-Slavery & Human Trafficking Policy and to report concerns. This policy is available through our intranet, management system, and is published on our website with a link on the home page.

Our managers are required to act whenever concerns are raised, whether from inside or outside the business.

To date we have had no reports of, and do not believe there is, modern slavery in our business or supply chain activities.

## ORGANISATION STRUCTURE

We are a UK-based construction company with a turnover in excess of £80m. Knights Brown has its head office and a divisional office in Ringwood, Hampshire and divisions based in Rochester, Kent and Bridgend, Wales. As a regional construction business we operate in southern England and Wales. Specialist services to the energy sector are provided nationwide and in the Republic of Ireland.

We employ fewer than 300 people and work closely with a small number of labour agencies.

## OUR POLICY ON ANTI-SLAVERY AND HUMAN TRAFFICKING

We are committed to acting ethically and with integrity in all business relationships and to implement and enforce effective systems and controls to, as far as we're able, ensure slavery and human trafficking do not take place anywhere in our company or supply chain.

[Modern Slavery & Human Trafficking Policy](#)

## OUR PEOPLE

Checks are made in person on original right to work documents in line with current legislation for all employees.

Our conditions for the supply of agency labour stipulate that the agency is responsible for undertaking obligatory right to work checks and in working with us, confirms that the labour it supplies has entitlement to work in the UK.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we continue to provide training to the appropriate members of staff. The HR team is responsible for providing training to our employees. Training is required on joining the company and updated every three years, or earlier if required.

Our e-learning programme informs members of staff about the Modern Slavery Act and their duties and responsibilities including how to report concerns. It has been accessible to anyone requiring this training during the pandemic. All directors have been briefed on the subject.



## OUR SUPPLY CHAIN

We engage with subcontractor organisations to carry out works and services on our construction sites and in sourcing materials and manufactured products. We currently work with approximately 500 subcontractors.

We are committed to ensuring that slavery and human trafficking plays no part in our supply chain.

As part of our initiative to identify and mitigate risk:

- We continue to build longstanding relationships with our suppliers and subcontractors wherever possible and make clear our business behaviour expectations.
- We expect all subcontractors to comply with our commitment and this requirement forms part of the vendor assessment process. Our supplier declaration requires evidence of each supplier's modern slavery policy or agreement to comply with Knights Brown's policy.
- Our people and those we work with are encouraged to challenge any unethical, dishonest or unacceptable behaviour encountered and to speak up if they see things that don't meet our high standards.

Our workers have the protection of our Whistleblowing Policy as granted by the Public Interest Disclosure Act 1998.

[Whistleblowing Policy](#)

We have worked closely with suppliers in the pandemic to ensure operations can continue efficiently as far as possible. Pressures brought about by the pandemic have put stress on cash management for the whole supply chain. In response we have worked even harder to improve the timeliness of our payments. We are monitoring our payment terms and while some are still longer than we would like, are aiming towards meeting the Prompt Payment Code's standard where, as a minimum, 95% of all payments are made within 60 days.

## RISK ASSESSMENT

One of the greatest risk areas for our business is in materials and supplier procurement. In 2019/20 we had planned an audit of materials procurement to ensure compliance with the act through our materials supply chain, some of which reaches overseas. Due to the disruption faced by many businesses as a result of the pandemic, this was delayed but we have now completed a review of our current top 100 suppliers. They have all been requested to provide a copy of their own modern slavery policy statement, or otherwise to confirm their compliance with ours.

It is expected that all suppliers will provide their own modern slavery statement or confirm compliance with our policy in a modern slavery declaration letter. We have prioritised our most frequent suppliers, however, we will continue to review our records and include more of our supply chain as we make further progress.

In addition, employees are required to review and confirm compliance with our anti-slavery and human trafficking policy when they join the company. We have recently introduced a requirement for all consultants to confirm compliance as well.



**Kevin Valentine | Managing Director**  
March 2021