



ANTI-SLAVERY & HUMAN TRAFFICKING

STATEMENT

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our company's anti-slavery and human trafficking statement for our last financial year ending March 2022. This statement has been approved by the Board of Directors.

INTRODUCTION

We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. All employees are expected to follow the guidance outlined in our Anti-Slavery and Human Trafficking Policy and to report concerns. This policy is available through our intranet, management system, and can be found published on the home page of our website.

Managers of the company are required to act whenever any concerns are raised whether from within or from outside of the business.

To date we have had no reports of modern slavery within our business or through our activities with our supply chain.

ORGANISATION'S STRUCTURE

We are a construction company based in the UK with a turnover in excess of £80m. Knights Brown has its head office and a regional office in Ringwood, Hampshire and regional offices in Rochester, Kent and Bridgend, Wales. We operate within the UK and also provide construction services to customers in the Republic of Ireland.

We have approximately 290 directly employed staff within the business and approximately 30 consultants. We also 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 our business relationships and to implement and enforce effective systems and controls to, as far as practical, ensure slavery and human trafficking is not taking place anywhere in our company or supply chain.

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 have approximately 550 subcontractors who we currently work with.

As part of our initiative to identify and mitigate risk:

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



- We are committed to paying our supply chain partners on time and it is our aim to meet the Prompt Payment Code's target of not less than 95% of all supply chain invoices being paid within 60 days. Details on how we are doing can be found on our website.

[Supply Chain Payments - Knights Brown](#)

Our Whistleblowing Policy is published on our website and is available through the link below.

[Whistleblowing Policy](#)

DUE DILIGENCE

Throughout the 2021-2022 financial year we worked with 401 different suppliers within the Materials & Plant sectors. We have approached 126 of them to date regarding their policies towards anti-slavery and human trafficking of which 70 were in the last 12 months. With over a 60% response rate for those suppliers contacted in the last 12 months we remain committed to achieving complete compliance with either our policy, or where suppliers have evidenced a policy is already in place.



KEVIN VALENTINE | MANAGING DIRECTOR
JUNE 2022

In addition, this year we will target companies with a spend in excess of £20,000 over the past financial year that we have not contacted previously under the Materials and Plant categories. The highest risk with the supply chains in these areas are where those companies import materials and plant from outside of UK territories and may have policies towards anti-slavery and human trafficking that are lacking or even non-existent.

We shall also carry out a review of those suppliers previously checked to ensure policies remain valid.

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 continue to provide training to relevant members of staff. This is provided on commencement with the company and is revisited every three years or earlier if required. Our e-learning programme informs members of staff on the Modern Slavery Act and their duties and responsibilities including how to report concerns. In 2022 we intend to roll our training out to relevant consultants. All directors have been briefed on the subject.