



MODERN 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 2023. 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.

We have had no reports of modern slavery in 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 £100m. 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.

We have approximately 300 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 labour agency terms, stipulate the responsibility of all our suppliers to undertake the required eligibility to work check.
- 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.
- This year we are introducing an on-line site induction for all workers on our sites including agency and supply chain. As part of this process we will outline how to report modern slavery.
- 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

During the 2022-2023 financial year we worked with over 400 different suppliers within the Materials & Plant sectors. We have approached 148 of them to date regarding their policies towards anti-slavery and human trafficking. We remain committed to achieving complete compliance with either our policy, or where suppliers have evidenced a policy is already in place.

This year we have targeted suppliers 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



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plant from outside of UK territories and may have policies towards anti-slavery and human trafficking that are lacking or even non-existent. We remain committed to completing this objective by end September 2023, with a further 70 to be contacted.

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 year we have improved our e-learning provision covering the Modern Slavery Act, duties and responsibilities which ensures a greater understanding of the risks and the action to be taken. This is provided on commencement with the company and is revisited every three years or earlier if required. In 2022 we rolled our training out to relevant consultants. All directors have been briefed on the subject.