



MODERN SLAVERY STATEMENT

Introduction

This statement sets out the Company actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the engineering sectors, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic.

The Board of Directors is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational Scope

This statement covers all activities of the Company, a family-owned business that operates within the Construction and Engineering Industry. Its main business activities include civil, mechanical, process engineering and MEICA engineering, including full EPC services for private and public sector clients.

Key sectors include process & water, energy and nuclear. The Company applies total engineering throughout the project lifecycle from design development through to commissioning and handover.

Services are provided for Clients both in the United Kingdom and internationally, employing circa of 800 people, 250 of which are field based operatives. To find out more about the nature of the business please click www.trant.co.uk

Countries of operation and supply

The Company currently operates in the following countries:

- England, Scotland and Wales.
- Falklands.
- Channel Islands.

In order to undertake its operations, the Company works with a range of suppliers including subcontractors, suppliers of materials and recruitment agencies.

The Company expectations and standards are communicated throughout the supply chain to set the standard of operation. It is the Company's ethos to build strong relationships with the supply chain to understand their policies and compliance to assess any potential risks. The Company's supplier approval process incorporates a review of controls undertaken by the supplier to assess compliance.



Responsibility for our anti-slavery initiatives is as follows:

Policies: The HR Department will plan and review policies in conjunction with the SHEQ & Systems Departments. Key Stakeholders have been involved in the development of policies including the Commercial Director with the commitment from the Managing Director and Board of Directors. The Quality department ensures governance and compliance.

Risk Assessments: The Company has formulated a modern slavery implementation plan which is reviewed with the Board of Directors, Commercial Director and key stakeholders. The Commercial Director in liaison with the Board of Directors have undertaken risk analysis on the supply chain, categorising suppliers as high / medium or low risk and implemented necessary action planning. All new suppliers to the Company must undergo a compliance exercise through our supplier questionnaire prior to any engagement.

Investigations and Due diligence: An audit process through our supply chain will be undertaken by Company auditors in order to ensure compliance with the Company and legislative values and standards. Any supplier or site or department who does not comply will be issued with non-conformances and be expected to rectify. The Company will provide guidance, help and support to ensure compliance.

Training: The Company has undertaken toolbox talks and issued publication material to be displayed on notice boards to raise awareness of modern slavery. It is the responsibility of all site management to ensure that staff have awareness. The Company will be rolling out a Modern Slavery e-learning package to staff and suppliers.

Policies

As part of the Company's commitment to addressing and opposing modern slavery there is a range of policies to identify modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **No Blame and Whistleblowing Policy:** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or those of its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- **Employee code of conduct:** The application of this policy provides clarity for employees regarding the behaviours that are expected of them and the actions that need to be taken when representing the Company. The Company expects employees to act with ethical understanding when interacting with the supply chain and operating overseas.
- **Supplier/Procurement code of conduct:** The Company is committed to working with suppliers to ensure the Company's standards are mirrored throughout the supply chain. Suppliers are required to provide evidence that they act ethically, provide a safe working environment.
- **Recruitment/Agency Workers Policy:** The Company uses only agencies that are on the preferred supplier list to source labour and always confirms the working practices of any new agency it intends to use before accepting workers from that agency.
- **Ethical Business Policy:** The Company is committed to maintaining the highest standards of ethics and integrity and to conducting its business legally, honestly and fairly and requires all its employees to carry out their duties in accordance with these principles.

Our suppliers are made aware of the Policies and are required to adhere to the same standards.

Due Diligence

As part of the Company's due diligence processes our supplier approval process is being developed to incorporate the following:

- Undertaking risk analysis on the supply chain to assess product or geographical risks of modern slavery and human trafficking.
- Assessing each new supplier for risk in accordance with this statement.



- Conducting supplier audits and assessments to ensure compliance with the Company's commitment to prevent modern slavery and human trafficking.
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to report on how they intend to address the practices.
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular, such as participation in "Stronger together" initiatives.

The procedures the Company is adopting have been designed to:

- Understand where there could be risk in the Company and the supply chain.
- Assess and review any risk in the Company and supply chain.
- Mitigate the risk of slavery and human trafficking.
- Give employees an avenue to raise concerns without the fear of reprisal.

Risk and Compliance

As part of the Construction and Engineering sector, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking as the industry has historically been found to be a highly targeted industry.

The Company assesses whether or not particular activities or countries are a high risk in relation to slavery or human trafficking by researching and assessing:

- The country in which the business operates specifically in countries where human rights are limited.
- In geographical regions in which the business operates where labour practices can be poor for migrant workers.
- On the supplier partnership risks.

High-risk activities

The following aspects are considered to be at high risk of slavery or human trafficking:

It is known that the construction industry and construction sites have been historically targeted by the trafficking regime and is considered to be of high risk to the Company operating within the said industry. The Company are committed to mitigating this risk through stringent identification checks of all staff directly employed by the Company, security clearance processes and complying with our contractual obligations for staff.

The Company also expect all recruitment agencies to follow Company policies and the Company only use approved reputable recruitment agencies. To ensure the potential for slavery and human trafficking is reduced as far as possible, the Company thoroughly check recruitment agencies before adding them to our list of approved agencies.

The Company also engages the services of subcontract labour both within the UK and internationally which is considered as high risk. The Company ensures that the supplier approval process is followed, and the Company applies its stringent subcontract assessment processes in compliance with pas91.

The Company has identified that supply of goods sourced from outside of the UK pose a high risk. To mitigate this the Company will check supply chains to ensure the potential for slavery and human trafficking is significantly reduced. The Company informs suppliers that we intend to engage with, that the Company is not prepared to accept any form of exploitation.



Performance indicators

The Company will instigate the following measures to monitor performance:

- requiring all staff to have completed training on modern slavery.
- Developing the system for supply chain verification whereby the company evaluates potential suppliers before they enter the supply chain.
- reviewing its existing supply chains, whereby the Company will evaluate all existing suppliers.

Training

The Company is committed to educating staff to recognise modern slavery and human trafficking in the Company and supply chains. The training programs will raise awareness, help to identify risk and encourage employees to report any breaches of this statement.

The Company's modern slavery training will cover:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the Company;
- The Company's purchasing processes in relation to the supply chain conditions.
- What external help is available through initiatives such as 'stronger together'.

Awareness-raising Programme

As well as training staff, we have raised awareness of modern slavery issues by distributing flyers to staff/putting up posters across our premises.

The flyers/posters explain to staff:

- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our Company.

Board/Member Approval

This statement was approved by our board of directors/members, who review and update it annually.

Philip Trant
Managing Director