



## **Anti-Slavery Statement**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that SWGR has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The Company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with our obligations under the Modern Slavery Act 2015.

The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

### **Our business**

As a market leader in a number of specialist areas, SWGR has established a reputable and premium business that delivers high-calibre projects and people as a single, focused solution.

Through three decades of expansion and consolidation, SWGR has diversified its offering to accommodate a number of professional people services across a range of sectors.

Through its six group companies: Manpower, Training Services, Welding Services, Industrial Supplies, Construction Services and Professional Services, the organisation provides a range of multi-disciplinary, integrated solutions for the infrastructure and built environment sectors, primarily focusing upon construction, engineering, rail and energy.

### **Our policies on slavery and human trafficking**

SWGR is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As part of SWGR's commitment to ensuring that there is no modern slavery or human trafficking in its supply chains, SWGR has the following internal policies to ensure that it is conducting business in an ethical and transparent manner:

- Recruitment – SWGR conducts robust checks on any new employee including eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing Policy – Each of our business divisions has a whistleblowing policy so that all employees can raise any concerns that they might have without fear of reprisals.

### **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we have in place systems to:

- Risk assess our suppliers
- Managing any risks highlighted with appropriate contractual clauses
- Ongoing review of contractual obligations

### **Supplier adherence to our values and ethics**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme.

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

### **Approval of this statement**

This statement has been approved by the SWGR Board of Directors on 1<sup>st</sup> August 2017.



Name: Terry Flynn

Position: Managing Director

Date: 1<sup>st</sup> August 2017