

Anti-Slavery & Human Trafficking Policy

Policy Statement

This statement has been produced pursuant to Section 54 of the Modern Slavery Act 2015. It states the actions the Group has taken during the financial year ending 31 March 2017 to ensure modern slavery and human trafficking is not taking place in our operations and supply chain.

Our Business

Gratte Brothers Group is a building services company providing from one source a complete range of electrical, mechanical, security and commercial catering facility services. The Group is made up of Gratte Brothers Ltd, Gratte Brothers Specialist Services Ltd, Gratte Brothers Security Management Ltd, Gratte Brothers Catering Equipment Ltd and Davis Willis and Associates Ltd. (as detailed in Figure 1).

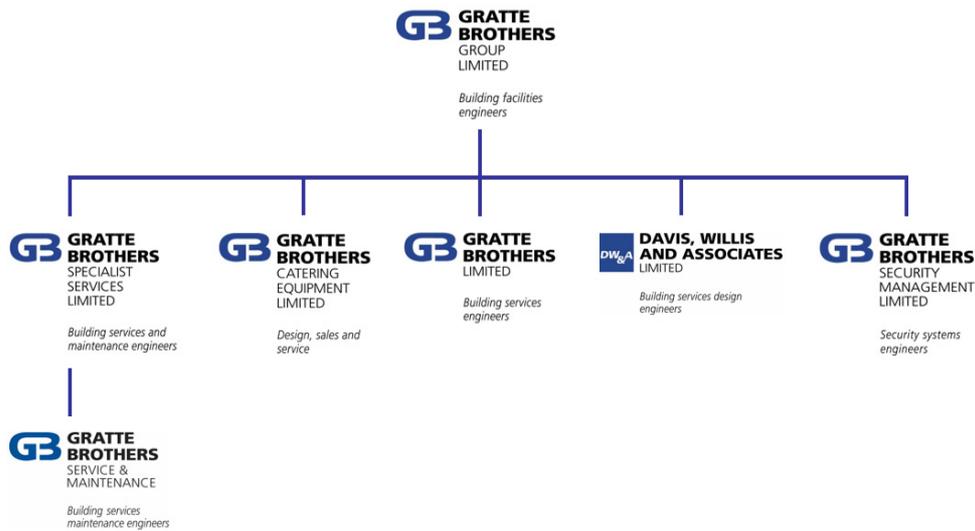


Figure 1

The Group operates from head office and 5 branch offices (Stevenage, Belfast, Warrington, Worthing and Crawley) as well as multiple sites across the United Kingdom and Ireland. The Group turnover exceeds the £36million threshold for this financial year.

Awareness across the business

As part of its inductions to new staff members and agents, the company will give guidance on identifying risk areas within its supply chain in regard to slavery and human trafficking. Refresher guidance will be given to existing staff members and suppliers at appropriate review meetings.

Our Supply Chain

The company's supply chain is made up of material and plant suppliers and trade sub-contractors.

The company's risk exposure to slavery and human trafficking is relatively small as the majority of workload offered to its supply chain is to UK or EU-based companies, with materials generally produced also in these areas.

Where it has been identified that elements of works and materials/products can be derived from outside the UK and Western Europe, especially high risk countries as detailed within the Modern Slavery Index, the company is in the process of identifying materials which originate from these countries and concentrating on these suppliers first, as they represent a higher level of risk to the company.

As part of the company's Supply Chain Approval process, a Pre-Qualification Questionnaire is issued where aspects of the supplier's social and ethical values including anti-slavery and human trafficking are examined.

The completion of this questionnaire allows the company to identify potential risk area(s) within the company's supply chain. The company also carries out a regular audit programme to ensure its supply chain is complying with the company's various requirements including anti-slavery and human trafficking.

The company has zero tolerance to slavery and human trafficking and encourages the disclosure of any concerns on this matter by its employees or supply chain. The company will endeavour, subject to legal requirements, to protect any "whistle blower", either from within the company or from any of the company's supply chain, who has disclosed such concerns.

Upon a claim of believed slavery and/or human trafficking being disclosed, the company will investigate the allegation and in the event of it being proven, will notify the relevant authorities while, as far as is practicable, providing support to the victim.

Further Training

In the next financial year a series of training measures around illegal working, slavery and forced labour will be developed for all sites. This will include toolbox talks and posters on how to recognise potential victims of trafficking and modern slavery with helpline telephone numbers and advice.

Immigration Act 2016

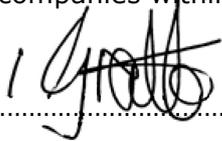
The Company recognises the implications of the Immigration Act 2016 and the penalties for employment of persons in the UK illegally. As part of the recruitment process all directly employed staff are required to



produce proof of their right to work in the United Kingdom. This is extended to sites, where the site teams require any supply chain workers to provide proof of their right to work in the UK at induction prior to commencing work. If there is suspicion that an illegal worker is a victim of trafficking or forced labour this will be reported to the relevant authority.

This statement has been approved by the Gratte Brothers board and applies to all companies within the Group.

Signed :



Date : April 2017.....

I P Gratte, Group Managing Director

