



GEORGE BIRCHALL GROUP MANAGEMENT LIMITED
MODERN SLAVERY ACT 2015

This policy applies to all officers and employees of George Birchall Group Management Limited (the Group) and its subsidiaries (George Birchall Limited & George Birchall Service Limited).

TRANSPARENCY STATEMENT 31st March 2017

Introduction from the Managing Director of George Birchall Group Management Limited

We are committed to maintaining and continuously improving our practices to combat slavery and human trafficking. We are totally opposed to such abuses in our direct operations, our indirect operations and our supply chain as a whole.

We all have a responsibility to be alert to the risk of this in our business. Staff are expected to report concerns and management are expected to act upon them.

Our understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015. We recognise that slavery and human trafficking can occur in many forms such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse. We are also aware that forced labour as a form of slavery includes debt bondage and the restriction of a person's freedom of movement whether that be physical or non-physical, for example, by the withholding of a workers identity papers. Throughout this statement we use the terms slavery and human trafficking to encompass all of these various forms of coerced labour.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes George Birchall Group Management Limited's slavery and human trafficking statement for the financial year ending 31 March 2018.

Signed:

Name: Mr. G. Birchall

Position: Managing Director

Date: 31.03.18

Review Date: 30.03.19

Our Business

Birchall Group was founded in 1980 and continues in the same family ownership.

Birchall Group delivers the full range of Mechanical and Electrical Building Services including Design, Installation and Maintenance. We operate nationally from our offices in London, Newcastle under Lyme and Edinburgh.

George Birchall Service Limited is the Maintenance and Management Facilities part of the group and is a 100% subsidiary of its Parent Company George Birchall Group Management Ltd. It sits alongside its sister company George Birchall Ltd which undertakes the Design and Installation of projects.

Birchall Group has over 400 direct employees.

Our Supply Chain

Our supply chain encompasses a diverse range of goods, works and services and spans many industry sectors. It is broadly grouped into the following categories.

- Mechanical and Electrical Building Services
- Professional and Outsourced Services
- Facilities Management, Engineering and Maintenance

Our first tier suppliers are 100% UK based.

For the purposes of this statement we report on steps taken within our supply chain, by which we mean those suppliers to the group with whom our organisation deals directly.

Relevant Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Anti-Slavery and Human Trafficking 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 endeavour to ensure that slavery and human trafficking is not taking place anywhere in our supply chains.

In keeping with our commitment to act with integrity in all our business dealings, many of our policies are relevant to ensuring that there is no slavery or human trafficking in any part of our business or our supply chains. Our relevant policies include:

- Anti-Slavery and Human Trafficking Policy
- Sustainability Policy
- Anti-Bribery and Corruption Policy
- Bullying & Harassment Procedure and Policy
- Corporate & Social Responsibility Policy (CSR)
- Diversity & Equality Policy
- Grievance Policy
- Human Rights & Equal Opportunities Policy
- Prevention of Illegal Working Policy

Due Diligence and Risk Mitigation Processes

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

- Identify and assess potential risk areas in our operations and in our supply chain.
- Mitigate the risk occurring on our operations and supply chain
- Monitor potential risk areas

Supplier Adherence to Our Values

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

This consists of:

- Modern Slavery Act compliance is set as a condition of participation in our tender processes
- Our procurement documentation and our contract terms and conditions require adherence with the Modern Slavery Act and we have robust audit rights.
- Any convictions under the Modern Slavery Act will result in termination of contract
- Maintaining an approved supplier list for recruitment an on-site single provider of contractor/ temporary staff. All of whom comply with Birchall Groups recruitment policies and practices via signed agreements.

Training and Communications

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we will provide training to our staff. We will also require our business partners to supplier to provide training to their staff.

Our Effectiveness in Combating Slavery and Human Trafficking

We do not have key performance indicators specifically in relation to slavery or human trafficking as many instance would be expected to be a non-compliance and be in breach of employment laws, our direct employment practices, our Code of Professional Conduct and/or our wider policies.

However, the business practices that relate to the mitigation of slavery or human trafficking risk do have internal performance measures.

In relation to our own employment practices, we monitor and review:

- Employee engagement scores
- Grievances
- Issues raised through Public Interest Disclosure
- Eligibility to Work Procedures
- Vetting and Security Guidance

In relation to our suppliers we use third part supplies to assess and monitor risk both before contracting with suppliers and during the course of the contract.