



MODERN DAY SLAVERY ACT 2015 POLICY STATEMENT

ESG is committed to tackling modern slavery of any kind within our operation. We commit to respecting all human rights, in alignment with international human rights standards, including the Universal Declaration of Human Rights. This commitment is a core aspect of our corporate values and is embedded in all levels of our business operations.

We support and promote freedom of association and the right to collective bargaining, ensuring our employees and those within our supply chain have a voice in their work conditions without fear of discrimination or retaliation.

We all have a responsibility to be aware of the risks, however small in our business and wider supply chain. Staff are expected to report concerns, using appropriate reporting channels and management are expected to act upon them.

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Essex Services Group Ltd during year ending 31 December 2023 to prevent modern slavery and human trafficking in its business and its supply chains.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit for personal or commercial gain.

Organisational structure

Essex Services Group Limited consists of ESG (The trading company) and 1 subsidiary company: Modular Engineering. The organisation operates within the construction industry and employs more than 280 staff across its site network and head office.

Our business

Our business is organised for operational purposes across multi-site locations, a factory setting in Rochford and a London office; all over seen by Head Office in Romford.

Our Supply Chains

We procure a wide range of goods and services through a diverse supply chain, which includes: • Main contractors

- Subcontractors who provide materials, labour and plant
- Manufacturers and suppliers who deliver direct to site or to the Subcontractor
- Utility companies, and
- Professional and specialist consultants linked to core activity.

Several of our suppliers will have turnovers which trigger a requirement to comply with the obligation to produce a Slavery and Human Trafficking Statement under the Act.

We have a stable supply chain allowing us to benefit from a significant number of long-standing trading relationships with like-minded Subcontractors, Suppliers and Consultants who share our values and ethics. We actively encourage all our suppliers notwithstanding the contents of the Act to ensure that they comply with the spirit and intent of the Act.

The materials that are ordered directly by our Regions or indirectly by our subcontractors are procured, in the main, under a National Supply Agreement by our centrally based Procurement Department who apply due diligence and tender processes via supplier evaluations.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our 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. To this end we conduct audit checks on our supply chain to verify they are acting in accordance with legal and ethical standards.

Due diligence processes for slavery and human trafficking

ESG employs solely within the UK. Our recruitment procedures ensure that all prospective employees are legally entitled to work in the UK and retain their own paperwork. ESG is proud to be a Living Wage employer.

Our recruitment and selection process ensures that all offers of employment state that all applicants are required to provide proof of their Right to Work in the UK, in accordance with the amendment to the Immigration, Asylum, and Nationality Act 2006.

All employees are paid directly into a bank account nominated by them. Employees have access to their own Payroll profiles via ADP and can edit this information with multifactor authentication for security.

We only procure agency labour from agencies affiliated with trade boards which we know are compliant ethically and legally. We commit to audit these organisations for confirmation that they continue to source staff ethically and provide the correct pay and conditions.

Our Supplier adherence to our values and ethics

Our human rights and social performance standards apply not only to our operations but also to our suppliers and subcontractors. We are committed to combatting slavery and human trafficking. We do not trade directly with any company outside of the U.K. unless specifically instructed to do so by a client. All suppliers are expected to comply with our human rights and labour standards as a condition of doing business with us. We request that all new suppliers confirm their understanding of the Modern Slavery Act 2015.

We have a dedicated compliance team, which consists of representatives from the following departments: Audit and Compliance, Human Resources, Health, Safety & Wellbeing and Procurement.

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 provide training to our staff. We do this via a variety of online training and toolbox talks. We also require our business partners to provide training to their staff and suppliers/ providers.

Further steps

We will continue to review the effectiveness of this policy and will look to ensure that we are adopting best practice and enforcing effective systems to prevent, monitor and eliminate slavery and Human trafficking.

For transparency, the company will publish the Modern-Day Slavery and Trafficking Act 2015 Policy Statement on its website for public review.

This policy applies to all those employed by Essex Services Group Ltd.

A handwritten signature in black ink, appearing to read 'Andy Hider'.

Andy Hider
Joint Managing Director

A handwritten signature in black ink, appearing to read 'Adam Cecil'.

Adam Cecil
Joint Managing Director

Date: March 2024