



Advanced Cold-formed Sections

Modern Slavery and Human Trafficking Statement

October 2018



Introduction

This statement sets out Advanced Cold-formed Sections 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. This statement relates to actions and activities during the financial year 1 April 2018 to 31 March 2019.

As part of the construction industry, Advanced Cold-formed Sections recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Advanced Cold-formed Sections 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 structure and supply chains

This statement covers the activities of Advanced Cold-formed Sections: -

- Advanced Cold-formed Sections is an innovative company in light steel framing technology, designing and installing steel frames within commercial, residential and retail accommodation. Advanced Cold-formed Sections currently only operates within the United Kingdom.

The following is the process by which the company assesses whether particular activities or countries are high risk in relation to slavery or human trafficking:

- Risk assessments are carried out annually with CIS checks on all sub-contractors. Identity checks are carried out on all new members of staff and annually thereafter if required.

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

- Advanced Cold-formed Sections does not have any high-risk activities due to the ongoing CIS and identity checks completed.

Responsibility for the Advanced Cold-formed Sections anti-slavery initiatives is as follows: -

- **Policies:** Nicola Weaver, HR Manager is responsible for putting in place and reviewing policies and the process by which they were developed.
- **Risk assessments:** Nicola Weaver, HR Manager is responsible for putting in place and reviewing risk assessments.
- **Investigations/ due diligence:** Lottie Stuart, Director of Advanced Cold-formed Sections and Nicola Weaver, HR Manager are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. They will then report onto the board of directors and the relevant supervisory bodies if applicable.
- **Training:** At commencement of employment and ongoing training is provided ensuring legislative updates are communicated with all employees annually in addition to this.



- **Relevant policies:** Advanced Cold-formed Sections takes Corporate Social Responsibility seriously and upholds their own internal ethics, ensuring we comply with all our legal responsibilities, our business ethics are upheld throughout the business, we ensure we protect the environment, protect our people and ensure human rights legislation is upheld.

Advanced Cold-formed Sections operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** - Advanced Cold-formed Sections encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of Advanced Cold-formed Sections. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Advanced Cold-formed Sections whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential disclosure form.
- **Employee code of conduct** - Advanced Cold-formed Sections code makes clear to employees the actions and behaviour expected of them when representing Advanced Cold-formed Sections. Advanced Cold-formed Sections strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- **Supplier/Procurement Code of Conduct** - Advanced Cold-formed Sections is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Advanced Cold-formed Sections works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of Advanced Cold-formed Sections supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency workers policy** - Advanced Cold-formed Sections uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due Diligence

Advanced Cold-formed Sections undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Advanced Cold-formed Sections due diligence and reviews include:

- Evaluating the modern slavery and human trafficking risks of each new supplier
- Conducting supplier audits and/or assessments through external auditors, which have a degree of focus on slavery and human trafficking where general risks are identified
- We will invoke sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship



Performance indicators

Advanced Cold-formed Sections has reviewed its key performance indicators (KPIs). As a result, Advanced Cold-formed Sections:

- Requires all human resources and accounts staff to have completed training on modern slavery by 31st December 2018
- Will be reviewing its existing suppliers again by 31st March 2019

Training

Advanced Cold-formed Sections requires all HR professionals and accounts staff within Advanced Cold-formed Sections to complete training on modern slavery.

Advanced Cold-formed Sections modern slavery training covers: -

- Our business's purchasing practices which are designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline
- 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 Advanced Cold-formed Sections
- What external help is available, for example through the Modern Slavery Helpline
- Gang masters and Labour Abuse Authority and "Stronger together" initiative

Awareness-raising programme

As well as training staff, Advanced Cold-formed Sections has raised awareness of modern slavery issues by circulating communications to staff.

The communications explain to staff the relevant issues from the list below:

- The basic principles of the Modern Slavery Act 2015
- 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 Advanced Cold-formed Sections
- What external help is available, for example through the Modern Slavery Helpline

Director approval

This statement was approved on the 1st April 2018 by Advanced Cold-formed Sections 's Board of Directors, who review and update it annually.



Director: C. Stuart.

Signature: Ljajstuf

Date: 16/11/18