



Modern Slavery Act Transparency Statement

Statement on slavery and human trafficking for financial year 2018/19

The statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Structural Waterproofing Services Ltd's (SWS) modern slavery and human trafficking statement for the financial year 1st Oct 2018 to 30th Sep 2019.

This Statement provides background to our organisation and our supply chains. It sets out the procedures that has been taken to ensure slavery and human trafficking are not taking place in our company or our supply chains.

Our company

Structural Waterproofing Services Ltd (SWS) is a registered limited liability company with registration no. 09766725.

Since 2016, SWS has provided complete turnkey above and below ground waterproofing protection solutions for all areas of Residential, Commercial, Industrial, Transportation and Mixed Development Construction Situations. We also have extensive experience within Civil, Infrastructure and Utilities.

SWS's Policies and operational procedures

We adhere to a few operational policies and procedures which reflect our commitment to acting appropriately within our business relationships, and we look to ensure the implementation and enforcement of effective processes and controls.

SWS is committed to opposing slavery and human trafficking in all forms and endeavours to act ethically, at all times, in all manners of business dealings and various relationships; ensuring that slavery and human trafficking does not take place within our company and/or our supply chains. As a result, we continue to work to finalise our Ethical Procurement Policy.

SWS's operational policies and procedures are applicable to all our staff as well as to those engaged on a temporary or consultancy basis.

The current key policies and procedures which contribute to minimising the risk of modern slavery and human trafficking in our organisation and our supply chain include the following:

1. **Health and Safety Policy** – to ensure the wellbeing of all our staff and others who may be affected by our business activities.
2. **Procurement Policy** – we make sure that certain factors are taken into account when selecting our supply partners, which includes consideration as to whether they will be suitable business partners. This involves detailed analysis of a supplier's reputation, integrity and compliance with laws and ethical procedures.

3. **HR procedures** – ensure that all employees hold the appropriate ‘right to work’ documents and are paid fairly and in accordance with the National Living Wage. Also, to put policies and procedures in place to safeguard the interests of all staff.
4. **Risk Management Policy** – designed to keep all our activities in line with all applicable laws, regulations and codes of governance (including in relation to slavery and human trafficking).
5. **Anti-Bribery and Corruption** – to account and report any improper or suspicious behaviour or situations, and to report and deal with the risk of fraud and corruption.
6. **Whistleblowing Policy** – provides guidance on how to report suspected dangers or wrongdoing in the workplace. All SWS staff, be it temporary or consultancy basis, are expected to report all concerns relating to slavery or human trafficking. Any concerns brought to our attention are duly investigated. Actions are taken as necessary without any adverse treatment to reporter.

SWS’s Supply Chains

We use suppliers to support the operations of our organisation. The key areas in which we engage suppliers to provide goods and services are:

- Internet
- Materials
- Professional services
- Design services
- Labour and training

SWS’s template agreements and standard terms and conditions require suppliers to comply with the law. This includes specific reference to the SWS’s commitment against modern slavery and human trafficking.

SWS’s Supply Chain Due Diligence

The key principals of SWS has reviewed our procurement processes to ensure that we take into consideration the different risks associated in our supply chains, including modern slavery and human trafficking.

We carry out due diligence checks on key suppliers and will monitor their compliance with applicable law; including in relation to slavery and human trafficking.

We are satisfied that our key suppliers have appropriate policies in place in relation to modern slavery and human trafficking. We will continue to review all of our suppliers and regularly assess our key suppliers in more detail to ensure that they have appropriate policies in place to minimise the risk of slavery and human trafficking in their business.

Due diligence and monitoring is ongoing and under periodic review to improve supplier vetting and to further minimise a range of risks, including slavery and human trafficking. This is led by company directors.

Training

We work hard to ensure that adequate information and training is provided to all the SWS staff or visitors on all relevant matters.

In terms of information and training:

All new entrants attend an induction session which includes information and training on our policies and procedures. We will endeavour to review induction sessions regularly and ensure that we

include specific reference to modern slavery and human trafficking and what we do to minimise the risk of this occurring within our company and our supply chain.

Key staff/principals are provided with relevant training and are provided with consultation on HR-related matters including in relation to recruitment, remuneration and employee wellbeing.

SWS will continue to seek out information and training to help identify risks in both our company and supply chain, including in relation to slavery and human trafficking.

Signature

A handwritten signature in black ink, appearing to be 'Tosan Hammond', written in a cursive style.

Tosan Hammond

Director

30 April 2019