

# Modern Slavery Statement



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# Modern Slavery Statement

## Policy Statement

Modern slavery includes Slavery, servitude, forced labour and human trafficking.

Modern slavery is fundamentally unacceptable within the operations of the HB Projects Group (HB Projects, Onyx and HBMS) and our supply chains. The HB Projects Group is committed to making sure modern slavery is not taking place within our operations.

This statement applies to the financial year ending 28<sup>th</sup> February 2021.

## About the HB Projects Group

The group includes:

HB Projects Ltd is a forward thinking, innovative and multi-disciplined Principal Contractor. HB Projects provide a diverse range of construction solutions from concept and design through to on-site delivery and post-completion.

Onyx - specialise in store fit outs and all aspects of Retail Project Management – including, planning, procurement, technical advice, installation and liaison with the client and Principal Contractor.

HBMS - Specialists in roofing and cladding systems for industry and commerce.

## Structure and supply chains

The HB Projects Group has a Head office in Bradford; HB Projects has three regional offices based in Gatwick, Bradford, and Livingston. Onyx has a regional office in Sunderland & Bradford. HBMS is based in Bradford. Construction sites are throughout the United Kingdom.

Our supply chain is divided into three separate areas: Sub-contractors, consultants, and suppliers. Product and raw material suppliers are complex

involving a number of different manufacturing processes.

Supply chain transparency is a priority for the HB Projects Group. In 2020/ 2021 our regional Procurement teams mapped our product supply chains and created a tier structure. The HB Projects Group's products and services are managed by our Central Commercial Director, supported by regional Procurement, Compliance and Commercial teams.

## Policies on modern slavery

Based on values-led leadership, we continually develop our management systems and service delivery to ensure we operate responsibly.

Our values are Innovation, Honesty, Quality and Teamwork.

Documents relevant to preventing modern slavery within the HB Projects Group, operations include:

- Procurement Policy
- Code of Ethics and Business Conduct Policy
- Supplier code of conduct
- Supplier Terms and Conditions – goods only and hire
- Subcontract Terms and Conditions
- Service Level Agreements
- Equality and Diversity Policy
- Whistleblowing Policy
- Discipline and Grievance Policy
- Anti-bribery Policy

All documents have been reviewed during the financial year to ensure they are up to date with Human Rights and are available to all employees on our electronic HR management system.

# Modern Slavery Statement

## Due diligence processes

HB Projects Limited have their standard sub-contractor contractual terms which include obligations of sub-contractors to gain the CHAS Premium Plus accreditation. This accreditation assesses health and safety arrangements and verifies anti-bribery, environmental and modern slavery obligations of the sub-contractor.

HB Projects Limited has their Corporate Social Responsibility management systems assessed separately by Sedex and Ecovadis. The assessments are based upon international CSR standards such as Global Compact Principles and the International Labour Organisation (ILO). We are currently able to indicate a structured and proactive CSR approach with engagements/policies and tangible actions on major CSR issues, with detailed implementation information.

Annual reviews are undertaken of service level agreements for our category A suppliers by HB Projects internal procurement team and the CHAS Premium Plus accreditation is reviewed daily by CHAS and our internal procurement and compliance team.

Onyx and HBMS have an internal due diligence process to verify their supply chain management system.

We understand that our biggest exposure to modern slavery is in our product and raw material supply chains. The due diligence and monitoring of these suppliers are objectives for 2021 and 2022 (respectively).

***Pre-qualification accreditation/ process for suppliers to be determined for 2021-222.***

***Performance management measurement criteria of our consultants and sub-contractors is an objective for 2022.***

## Risk assessment

The HB Projects Group recognises that there is a risk of modern slavery in any area of our business where there is the potential for:

- Migrant labour
- High presence of refugees
- Contract and agency workers
- Child labour and young workers
- Women workers

***Our aim for 2022-2023 is to map our sub-contractors and consultants to assess the above risks along with preventative steps taken. For 2023-2024, we will address further commitments***

## Measuring effectiveness

Our management systems all work to the Plan, Do, Check and Act cycle. We are very much in the early stages of identifying our modern slavery risks (plan) within the organisation. We will identify and understand our area of greatest risk, where our actions can have a positive impact and measure our effectiveness once established within our procurement processes.

## Training

The HB Projects Group undertakes awareness training for all employees; a modern slavery awareness film is shown to all new starters in their company induction with Directors.

All our internal buyers have completed or are undertaking CIPS training which includes a module on ethical trading, modern slavery and CIPS Code of Conduct.

***Our aim for 2021 and 2022 is to continue with our employee and sub-contractor information forums to create awareness of modern slavery.***

# Modern Slavery Statement

## Actions in 2020-2021

- *Developed and implemented a HB Projects Group Procurement Policy.*
- *Mapped our product suppliers and created a tier structure with key performance indicators.*
- *Mandatory requirement for all sub-contractors to have CHAS Premium Plus accreditation implemented.*

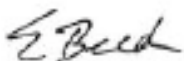
## Further steps

### Commitment for 2021-2022

- *Pre-qualification accreditation/ process for suppliers to be determined.*
- *Map our sub-contractors and consultants and create a tier structure.*
- *Map our supply chain to modern slavery risks along with preventative steps taken.*
- *Create a modern slavery hub, which will be mandatory for all employees to access and complete periodically.*

### Commitment for 2022-2023

- *Extend supplier compliance and ethical standards training/awareness.*
- *Performance management measurement criteria of our suppliers, consultants', and sub-contractors.*
- *Create learning hubs for our employees and supply chain on CSR subjects.*



Ed Beck

Managing Director