



## **MODERN SLAVERY POLICY**

### **MODERN SLAVERY POLICY STATEMENT**

Comex 2000 (UK) Ltd has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all our business dealings and relationships. We are also dedicated to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within our business or supply chains, consistent with our obligations under the Modern Slavery Act 2015.

This statement sets out our actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own company or our supply chains. This statement relates to actions and activities during the financial year 1 April 2020 to 31 March 2021.

### **ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS**

The Company is privately owned and is a provider of network and communication services throughout the UK. The Company's supply chain is primarily based in the UK and supplies aggregates, components and telecom cables. In addition, the Company makes use of a range of subcontractors from labour only to fully serviced labour, plant and equipment providers responsible for service delivery.

A number of our clients supply materials to us directly on a free-issue basis which they are responsible for sourcing via their own supply chain partners.

### **COUNTRIES OF OPERATION AND SUPPLY**

The Company currently operates in the United Kingdom and Northern Ireland.

The Company has assessed where the risk areas of slavery and human trafficking could be in relation to countries of origin of materials or through our activities.

As we are operating exclusively in the UK with the majority of our suppliers also based in the UK, we consider the overall risk of slavery and/or human trafficking through the materials we procure to be low. Within the subcontractors we use to provide labour we have implemented processes to check the policies and practices of those companies before they commence any work with the Company.

For all employees, we carry out Right to Work in the UK checks and pay minimum wages or above in accordance with published UK government legal guidelines in respect of the Minimum Wage.

### **POLICIES AND CONTRACTUAL PROVISIONS**

The approach of Comex 2000 to the promotion of modern slavery issues is contained within our company policies which include but are not limited to:

- Modern slavery and anti-trafficking policy
- Anti-Bribery and Corruption Policy
- Equal Opportunities Policy
- Dignity at Work Policy
- Recruitment Policy

Our policies apply to all individuals employed or engaged by Comex 2000.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains. If employees believe or suspect a breach or conflict has occurred or may occur, they must notify a member of the Executive Management Team and HR immediately.

The Company has taken steps to ensure that agreements with suppliers include an express obligation for suppliers to comply with the Modern Slavery Act 2015, to implement due diligence procedures within its own supply chains and notify Comex 2000 in the event of any actual or potential incidence of modern slavery.

In the event of a breach of those provisions, the Company will seek to resolve any issues with its suppliers and it may also seek to terminate the relationship with the supplier where a resolution is not achieved.

This provision is regularly reviewed and relevant amendments made.

## **ASSESSING AND MANAGING RISKS**

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. The Company is committed to ensuring no-one suffers any detrimental treatment or victimisation because of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

The Board of Directors has overall responsibility for ensuring that the Company meets both its legal and ethical obligations.

The HR Department, along with other support service functions, will monitor the use and effectiveness of any policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery and carry out necessary internal audits. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with the Company's policies.

## **DUE DILIGENCE**

Comex 2000 have identified subcontractors as the main area of risk and exposure to modern slavery. As a result, we have enhanced the requirements of our subcontractor onboarding and annual review process. These requirements mean subcontractors regardless of size are to implement policies around the avoidance of any sort of modern slavery within their operations.

## **PERFORMANCE INDICATORS**

The Comex 2000 Board appreciates that the approach to combatting modern slavery will have to adapt over time in response to findings following the completion of various risk assessments. The Comex 2000 Board intends to monitor the following KPIs to measure how effective the processes have been:

- The number of employees who have received toolbox talk briefings on modern slavery
- The number of new starters who have received Modern Slavery awareness during induction
- The number of subcontractor policies or equivalent communicated around modern slavery.

This statement and policy has been approved on behalf of the Comex 2000 Board on 31<sup>st</sup> March 2021.



**Mark Philby**

**Managing Director**