

## Modern Slavery and Anti Human Trafficking Statement

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This is a statement made by The Freedom Group Of Companies Limited (Freedom) in accordance with Section 54 of the Modern Slavery Act 2015. This statement sets out the steps Freedom is taking to ensure that there is no slavery or human trafficking in our supply chains or in any part of our business. This statement relates to actions during the financial year 1 May 2018 to 30 April 2019.

It is a fundamental policy of Freedom's to conduct its business with honesty and integrity and in accordance with the highest standards of ethics, equity and fair dealing. We know that slavery, human trafficking, servitude and forced labour (Modern Slavery and Human Trafficking) is a global and increasing challenge for governments and business.

### Organisational Structure, Business and Supply Chains

Freedom is a wholly owned subsidiary of NG Bailey Group and a leading provider of infrastructure support services to the utility sector consisting of a number of business units and supply chains including contractors, sub-contractors and suppliers. Parts of the business also operate a franchise business model with a number of franchise companies operating around the UK.

The organisation operates in the United Kingdom. Freedom's supply chain is also primarily based in the UK and a number of our clients supply materials to us directly on a free issue basis.

### Relevant Policies

To further our organisation's commitment to combating Modern Slavery and Human Trafficking, we have the following policies in place:

- Freedom ensures that all business units and associated suppliers within our supply chain are aware of the Company's [Code of Conduct](#) to make everybody aware of their obligations.
- Furthermore, the Company has a [Whistleblowing Policy](#) with effective mechanisms in place to cover any concerns about slavery or human trafficking within any business unit or supply chain.

### Risk Assessment and Due Diligence Process

Reflecting the United Nations Guiding Principles on Business and Human Rights (UNGPs) our due diligence activities to combat Modern Slavery and Human Trafficking, described below, are risk based and will in future correspond with the level of risk identified. As such, we have undertaken or identified the following risk assessments approach:

Freedom has undertaken a supply chain review and risk assessment conducted by the Procurement Department to highlight those areas within its supply chain that may be exposed to a higher degree of risk in regards to Modern Slavery and Human Trafficking.

In order to seek to prevent Modern Slavery and Human Trafficking in our business and supply chains we have introduced specific questions relating to Modern Slavery and Human Trafficking during the pre-qualification of our sub-contractors.

In addition, checks will also be carried out during annual sub-contractor business reviews to ensure continued compliance is achieved and to monitor the effectiveness of the activities put in place in order to combat Modern Slavery and Human Trafficking. We have committed to conduct five annual audits of the selected sub-contractors in line with our company CSR matrix.

For all directly employed employees we carry out Right to Work in the UK checks. Our employees are paid at or above the National Minimum Wage/National Living Wage rates.

**Training**

The Procurement Department has been briefed by an external source to ensure that our key personnel involved within our supply chain activities have a sound understanding of Modern Slavery and Human Trafficking, in particular where it is most likely to exist and how it may impact upon Freedom.

**Board Approval**

With these processes and the training that has been undertaken, we are satisfied that Freedom is taking appropriate steps to ensure that slavery and human trafficking is not taking place in any parts of the business or in its supply chain. Freedom will monitor the effectiveness of the steps it is taking on an ongoing basis and will report on any relevant additional steps in its next annual statement under the Modern Slaver Act.

This statement has been approved by our Company's Board who will review, update and publish this statement annually.

Approved by the Board on 3<sup>rd</sup> November 2018 and signed on its behalf by:



Peter Jones  
Managing Director – Services Division