

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 for the financial year ended 30<sup>th</sup> April 2018.

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 became a wholly owned subsidiary of NG Bailey Group on 30<sup>th</sup> March 2018. Freedom remains a leading provider of infrastructure support services to the utility sector and consists of a number of business units. Our supply chain includes 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.

## Modern Slavery and Anti Human Trafficking Statement

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- 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.

### 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 under the Modern Slavery Act as part of the NG Bailey Group report in future years.

Approved by the Board on 25<sup>th</sup> March 2019 (superseding the statement dated November 2018) and signed on its behalf by:



Mike Porter

Director

The Freedom Group of Companies Limited