

Esh Group Modern Slavery

POLICY

Modern Slavery Statement for financial year ending 31st December 2019.

This statement is made pursuant to section 54(1) The Modern Slavery Act 2015 and sets out the steps that Esh Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Our Business

Esh Group is a leading construction company operating across the North East, Cumbria, Yorkshire, Central and Southern Scotland.

Companies include:

- Esh Construction Limited
- Esh Homes Limited
- Deerness Fencing and Landscaping Limited
- Finlaysons Contracts Limited

The key areas of our operation that could be affected by slavery and human trafficking are our directly hired employees, agency workers working on our behalf, subcontractor operatives working on our sites, and the workforce of our supply chain who supply materials to our business. The steps that we take to mitigate risks in relation to each of these areas are as follows:

Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Ethical Governance Policy, the highest standards of integrity and accountability are expected to be adhered to by all company directors, employees, third parties, including subcontractors and their employees.
2. Recruitment policy. We verify that all workers have the right to work in the UK prior to employment. All employees are aware of their working hours, leave and absence entitlements and other benefits via employee handbook and contracts of employment.
3. Whistleblowing policy. We operate a whistleblowing policy applicable to all workers and stakeholders [internal and external] that actively encourage the reporting of unethical behaviour or practices within our business or supply chain without fear of reprisals.

Our Supply Chain

Esh operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. Suppliers are required to confirm that their business operations comply with the Modern Slavery Act. We may terminate the contract at any time should any instances of modern slavery come to light.

Company Adherence

During 2018, Esh Group have continued to raise awareness of slavery and human trafficking:

- Procurement team completed mandatory training on Slavery & Human Trafficking
- Site based "Toolbox Talks" to operatives
- Quarterly supplier meetings whereby ethical trading initiatives were discussed & monitored
- Supplier questionnaires monitored
- Adherence to BES 6001
- Right to work checks

The Group HR Director is responsible for the contents of this statement, which will be reviewed and updated on an annual basis. Overall accountability for compliance rests with the Executive Board.

Signed for, and on behalf of, the Executive Board:

Andy Radcliffe
Group Chief Executive Officer



1st August 2020