

Modern Slavery and Human Trafficking Statement

Policy Number	POL14
Revision	1
Date	September 2019
Next Review	September 2020

1. Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

2. Statement

Structherm Limited are market leading experts in Structural External Wall Insulation refurbishment solutions for the non-traditional low and high rise social housing market. We also supply a full range of standard External Wall Insulation (EWI) systems along with a variety of renders and finishes.

This statement is made on behalf of Structherm Limited pursuant to Section 54 (1) of the Modern Slavery Act 2015 and comprises our slavery and human trafficking statement for the financial year ending 2019.

Structherm Limited has adopted a zero-tolerance approach to modern slavery and human trafficking and is committed to improving our practices and ensuring that there is transparency in our business and throughout our supply chain. We are constantly reviewing and updating our contracting processes to include specific prohibitions around modern slavery and human trafficking, and we expect and require our suppliers to apply these same high standards.

We aim to provide top quality products, systems and services in an efficient, safe, ethical and sustainable manner.

3. Scope

This statement shall apply to all who work for us or on our behalf in any capacity, including employees at all levels of the organisation, as well as contractors and suppliers.



4. Our Commitment

As an organisation, we expect everyone working with us and/or on our behalf to uphold the following measures to safeguard against modern slavery and human trafficking:

- A zero-tolerance across the organisation and within the supply chain;
- The prevention, detection and reporting of modern slavery and human trafficking is everyone's responsibility and should be reported immediately;
- Address the risk of modern slavery and human trafficking within the organisation and the supply chain;
- Apply a risk-based approach to the contracting process and to keep such under review. Our own risk-based approach allows us to assess the merits of contacting suppliers and requiring them to comply with our code of conduct and minimum standards to combat modern slavery and trafficking;
- Employment and recruitment agencies and any other third parties involved in supplying workers to our organisation shall confirm their compliance with our code of conduct and minimum standards;
- To carry out audits, as appropriate, of suppliers to assess their compliance with our code of conduct and minimum standards;
- Appropriate action will be taken against any individuals and/or organisations that are found to be in breach of our minimum standards and code of conduct in relation to modern slavery and human trafficking, including remediation of breaches and termination of the relationship.

5. Business And Supply Chains

Structherm Limited prohibits the use of modern slavery and human trafficking in our operations and throughout our supply chain.

We have implemented systems and controls and will continue to review and update these systems and controls which are aimed at ensuring that modern slavery and human trafficking are not taking place anywhere within our business and/or supply chain and we expect our suppliers to hold their own suppliers to the same high standards.

6. Policies

Everyone working for, within or on behalf of our organisation have an obligation to report on measures to ensure that all parts of our business and supply chain are complying with this statement and all applicable laws relating to modern slavery and human trafficking.

Our workplace policies and procedures, including our Modern Slavery and Human Trafficking Statement, demonstrate our commitment to acting with integrity and ethically in all our business relationships. We will continue to implement, assess and enforce effective controls and measures to ensure that slavery and human trafficking are not present within our organisation, including our supply chain.

7. Due Diligence Processes and Audits of Suppliers and the Supply Chain

As part of Structherm Limited's initiative to identify and mitigate risk, the organisation has put systems in place to:

- Protect whistle blowers reporting on modern slavery and/or human trafficking violations;
- Mitigate against the risk of modern slavery and human trafficking from occurring in our supply chains by conducting due diligence on suppliers;
- Identify, assess and monitor any potential risk areas within the organisation and the organisation's supply chain.

8. Supplier Adherence To Our Values

Structherm Limited has adopted a zero-tolerance approach to modern slavery and human trafficking and we shall endeavour to ensure that our supply chain operate within and comply with our code of conduct.

We shall have a number of measures in place to ensure and monitor compliance, including:

- A dedicated compliance team made up of members from the following departments:
 - Audit and Compliance;
 - Legal;
 - Human Resources;
 - Procurement; and
 - Sales.
- Robust supplier agreements that require compliance with modern slavery and human trafficking laws;
- Review and update existing supplier agreement to ensure compliance with modern slavery and human trafficking laws.

9. Training

It is our intention to train our key staff in modern slavery, human trafficking and human rights. This may include using an expert third party consultancy to support each business area in mapping risk assessment and developing a mitigation response. We will develop Ethical Trade training for our procurement, sales and business development leaders which shall then be rolled out across the business by the end of 2020/2021.

We shall, furthermore, conduct specific training sessions on modern slavery, including awareness-raising of the signs of modern slavery and information on how to raise complaints within the organisation.

Structherm Limited shall expect their suppliers to implement their own in-house training to ensure compliance with the principles of the Modern Slavery Act 2015 and the prevention of modern slavery and human trafficking. Our suppliers shall also be required to keep a record of the training offered and completed by their employees and a copy of this training record shall be available to Structherm Limited upon request.

We shall regularly, at least annually, assess how effective our organisation has been in ensuring that slavery and human trafficking is not taking place in any part of our organisation or supply chains. This assessment will inform what further steps will be taken to combat modern slavery and human trafficking.

10. Further Steps

Following a review of the effectiveness of the steps we have taken as an organisation during the year to ensure that there is no slavery or human trafficking within our organisation, including our supply chain, the organisation shall put in place further steps to be achieved to combat slavery and human trafficking.



11. If in doubt

If, at any point, the terms and provisions of this Statement are unclear, please contact the Compliance Officer to explain further.

This statement was approved by the Board of Directors of Structherm Limited.

Signed



Full Name	David Harrison
Job Title	Managing Director
Date	09 September 2019

