

# **MODERN SLAVERY ACT 2015**

## **NG BAILEY STATEMENT 2017/18**

## INTRODUCTION

NG Bailey Group Limited remains fully committed to compliance with the Modern Slavery Act 2015 (“Act”) in all its divisions, not only in its own dealings but in those of its supply chain.

This year, we have continued to take action to combat slavery and human trafficking in our business and will continue to work to ensure this does not occur in our supply chain.

This statement has been published in accordance with the Act and sets out the steps we have taken to prevent slavery and human trafficking in our business and supply chains.

This statement has been approved by our Directors.



DAVID HURCOMB  
CEO

## Organisation's structure and business

The NG Bailey group of companies is made up of the following trading companies:

NG Bailey Group Limited – parent company  
NG Bailey Limited  
NG Bailey IT Services Limited  
NG Bailey Facilities Services Limited  
Kedington (Northern Ireland) Limited  
Bailey Leasing Limited

Our head office is at Denton Hall, Denton, Ilkley, West Yorkshire LS29 0HH.

We are one of the UK's leading independent engineering, IT and facilities services business operating in the UK and Europe. We design, build, operate and maintain building infrastructure and IT services.

We are a national business with a local presence with 16 offices across the UK. We also operate internationally with occasional projects and teams operating overseas.

We employ approximately 3,000 people within the Group, with an annual turnover of £481m. Our people form the backbone of our business and we continue to invest significantly in training.

## Our supply chains

Our supply chain includes a mix of large multi-national organisations and SME's delivering a diverse range of products, systems, services and trades. The vast majority of our trading arrangements are focussed within the UK with specific contracts and individual client needs requiring us to procure goods and/or services from within the EU on an ad-hoc basis. All our contracted suppliers of goods and services are obliged, through our MySupplyChain pre-qualification system, to mirror our approach to slavery and human trafficking.

In order to ensure we have a clearer view of our supply chain, a rationalisation programme has been undertaken over the past 24 months – this has reduced our 'live' suppliers to approximately 2,500 across our Group. Furthermore, our strategy of working closer with a smaller number of key strategic suppliers affords us the opportunity to embed ourselves within our mutual businesses and develop a much clearer view of the entire supply chain.

On an ongoing basis our supply chain is risk assessed in order to ensure we are measuring against ever changing market conditions.

## Our policies on slavery and human trafficking

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

A copy of the NG Bailey Anti-Slavery and Human Trafficking Policy is available on our website and accessible via this [link](#).

To re-inforce our commitment to this issue we also make available to all stakeholders via our website, our Code of Integrity for Business Partners (updated for 2018), our Responsible Procurement Charter, and our Speak Up (whistleblowing) policy each of which sets out our expectations of our supply chain and reinforces our commitment to responsible procurement.

## Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have formed a cross functional working group with representatives from our procurement, legal, responsibility, human resources and internal audit teams.

We have a zero tolerance attitude to slavery and human trafficking and as such have assessed the risk to our organisation as part of our development of this statement. As a Group we have taken the following steps:

- We have continued to raise the profile of modern slavery with both our employees and supply chain. Central to this approach are our refreshed Code of Integrity documents for both our employees and business partners. These documents outline specific expectations of our employees and business partners with regards to modern slavery. In addition, our Speak up policy has also been refreshed to make it easier and clearer for anybody to report concerns. Other communications have incorporated the use of intranet posts, an ongoing poster campaign, continued coverage in our induction programme and the inclusion of modern slavery in the agenda for our annual supply chain conference. The conference saw us engage directly with 65 of our suppliers with 97% reporting that they found the presentations to be very informative or informative.
- Our UK recruitment policy continues to state that all applicants must be asked to provide at interview original copies of their proof of the Right to Work in the UK, in accordance with the amendment to the Immigration, Asylum, and Nationality Act 2006. It is the recruiting manager's responsibility to check each applicant can provide proof of the Right to Work in the UK and subsequently verify the documents. Furthermore, when new employees join NG Bailey, pre-employment checks are conducted. These include ensuring that the bank account details provided for the payment of salary match the name of the employee. Where discrepancies arise we will discuss with the employee and escalate further where necessary. We do not make any cash payments to any of our employees. We also request a National Insurance number which forms part of an individual's evidence of the Right to Work in the UK.
- Where we utilise the services of temporary labour resource within our business, we seek to ensure compliance with the Act through the imposition of a number of contractual obligations on our third party agencies. To support the contractual position we also seek regular data from providers to demonstrate compliance.
- To ensure all those in our supply chain and contractors comply with our Anti-Slavery and Human Trafficking Policy we have in place a rigorous supply chain compliance programme. This consists of a robust prequalification system called MySupplyChain. This requires all our new suppliers to explicitly detail, reference and support with evidence, their approach to tackling slavery and human trafficking. For existing suppliers this disclosure process is ongoing. Any supplier that does not complete the required questionnaire or provides an inconsistent response will be referred to a senior member of our procurement team for investigation. In addition, our Engineering division has been developing a supply chain audit programme that incorporates modern slavery into the review. This programme will roll out across our Engineering supply chain from May 2018.
- Our standard trading terms, commercial agreements and subcontract conditions contain a provision that places an obligation upon our supply chain to mirror our slavery and human trafficking commitments and to ensure their compliance with the Act. Our standard payment procedures dictate that we do not make cash payments to our material and labour suppliers.

## Continuing to manage our risk

In our 2016/17 statement we set out a series of key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. Our performance against these KPI's is disclosed in the table below:

KPI	Status	Update
Target training to 100% of our procurement professionals;	Ongoing	To ensure we are delivering quality training to our people we have examined multiple training options over the past year and have now secured an approach. Although we have been unable to reach 100% of our training target we remain focused on delivering modern slavery training to our procurement and commercial teams within the current financial year.
Provide relevant updates to our employees on the continued risk of slavery and human trafficking to our business to ensure awareness is maintained	Ongoing	Our ongoing poster campaign remains visible across the business and our refreshed Code of Integrity document further outlines the expectations of our employees. We will continue to ensure that employees are kept informed of modern slavery where relevant and appropriate.
Continue to map our spend profile to the Global Slavery Index on an annual basis in order to develop a 'Heat Map'. Any spend falling within the high-risk regions, either directly or indirectly will be subject to a higher degree of scrutiny.	Ongoing	Our procurement function continues to map and monitor our spend profile against the Global Slavery Index on an annual basis. Although, our last assessment did not identify any direct spend in high-risk regions we will continue to examine and map our supply chain.

We will continue to work towards the delivery of our KPI's in the forthcoming year.

## Further steps

We remain committed to the ongoing delivery of the further steps outlined below. These steps are designed to reinforce our effort to prevent modern slavery occurring in our supply chain and update on our progress has been provided below:

Further steps	Status	Update
Monitoring our performance against the KPI's listed above and communicating to the business where performance needs to be strengthened;	Ongoing	Our cross functional working group is responsible for monitoring progress against our KPI's, effecting change and communicating updates to the business.
Where satisfactory controls do not currently exist, collaborate with our supply chain to develop an agreed approach to modern slavery and human trafficking;	Ongoing	We continue to engage our supply chain in modern slavery and where they fall short of our expectations we will work with them to ensure compliance. We will be reviewing our modern slavery compliance approach in the forthcoming year.

Consider and determine an audit methodology to ensure compliance within our supply chain.	Ongoing	A supply chain audit programme is currently underway within the business with modern slavery directly incorporated into the audit approach. The outputs of these audits will provide us with further insight into the steps our supply chain has taken in their management of modern slavery. Where satisfactory controls are not in place we will address it directly with our supply chain.
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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2<sup>nd</sup> March 2018.

David Hurcomb



Chief Executive

NG Bailey Group Limited

June 2018