



# MODERN SLAVERY STATEMENT

JAN - DEC 2023



Team players



Doing the right thing



Positive



Customer focused



Professional

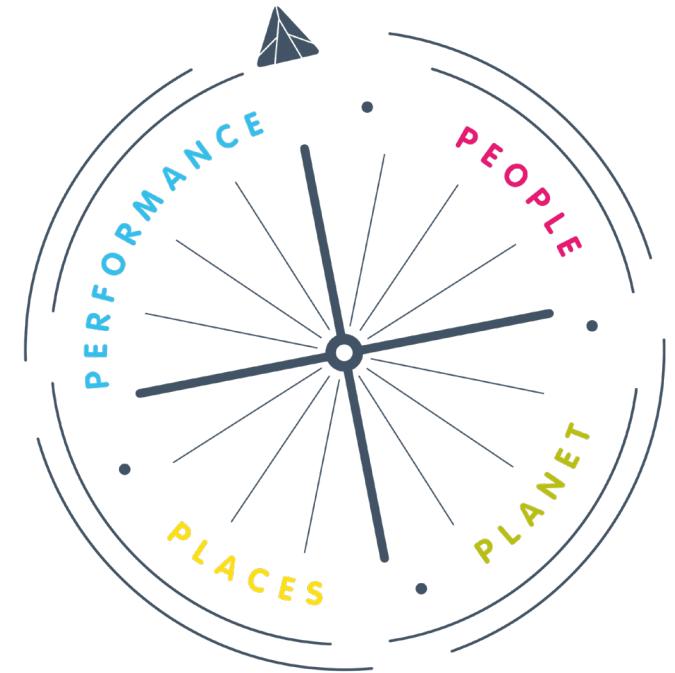


## I. INTRODUCTION

This document is Sewell Group Ltd and its subsidiary companies' Modern Slavery Statement and is part of arrangements they have in place to ensure statutory and ethical compliance with Human Rights.

Many of the businesses within Sewell Group do not meet the threshold for legally requiring a Modern Slavery Statement. However, as a reputable organisation who embrace moral and ethical best practise, we issue this statement that collectively applies to all businesses within the Group's Estates division.

This Modern Slavery Statement is made pursuant to section 54 of the Modern Slavery Act 2015 in respect of the financial year 01 Jan 2023 to 31 Dec 2023. It sets out the steps that Sewell take and continue to take, to ensure that modern slavery and/or human trafficking does not take place within our business or supply chain. Modern slavery encompasses slavery; servitude; human trafficking and forced labour. Sewell has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparently in all our business dealings and to put effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.



## 2. ORGANISATION STRUCTURE AND SUPPLY CHAINS

Sewell Group comprises of multiple businesses that operate in the built environment sector across England. These businesses are:

### **SEWELL CONSTRUCTION LTD.**

Providing Design and build project, refurbishment and civils maintenance of commercial properties and industrial sites. Operating in both public and private sectors they have a diverse portfolio covering health and education premises.

### **SEWELL FACILITIES MANAGEMENT LTD.**

Providing hard and soft FM services across primarily public sector organisations including health and education premises.

### **SHARED AGENDA SOLUTIONS LTD.**

Providing estates management and built environment consultancy services both public and private sectors they have a diverse portfolio covering health and education premises.

### **CITYCARE LTD. AND SUBSIDIARIES**

Owns and provides Estates management to health premises across the Hull area.

### **ILLINGWORTH AND GREGORY LTD.**

Providing Design and build project, refurbishment and maintenance of commercial properties and industrial sites. Operating in both public and private sectors they have a diverse portfolio covering health and education premises.

### **SEWELL GROUP LTD.**

A team of professionals delivering corporate services to the other businesses in Sewell Group. The teams within this business are Safety, Environment and Compliance, Human Resources, Information and Computing Technology, Marketing and Communications, Finance Services.

Owns and operates Sewell offices used by Sewell Group businesses.

### **SEWELL INVESTMENTS LTD.**

A zero-employee organisation that owns and operates real estate and invests in several joint venture partnerships (e.g. Hull Esteem Ltd, Hull Eco Park Ltd).

### **COMMUNITY VENTURES MANAGEMENT LTD. AND SUBSIDIARIES**

Providing estates management and built environment consultancy services across both public and private sectors they have a diverse portfolio covering health and education premises.

### **PARALLEL DATA INTELLIGENCE LTD.**

Providing digital data mapping services to national and international customers from both the private and public sector.

### **ASSURE ADVISORY LTD.**

Technical consultancy providing facilities management advice and support. Supporting maintenance and lifecycle strategies to ensure building compliance and reducing risk.

## SUPPLIER CATEGORIES

The bulk of Sewell Group’s supply chain is utilised by the two construction companies and the Facilities management businesses. All Sewell Group’s businesses strive to use suppliers from within a forty-mile radius of their respective head office location.

	Agency Trades	Subcontractor Trades	Consultancies	Materials and plant Suppliers
Sewell Construction	x	x	x	x
Sewell FM	x	x	x	x
Shared Agenda		x	x	
Citycare		x	x	
I&G	x	x	x	x
CVM		x	x	
Parallel			x	



## 3. POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

This statement should not be read in isolation as we operate a number of internal policies and procedures which aim to ensure we are conducting business in an ethical, legally compliant and transparent manner. Our employees are expected to report their concerns and our management to act upon them.

- Employment records retention and erasure
- Anti-Fraud, Bribery and Corruption Policy
- Capability, Disciplinary & Grievance Policy
- Competition Policy
- Conduct whilst on Company Business Policy
- Data Protection Policy
- Disclosure & Barring Service Policy
- Equal Opportunities and Dignity at Work Policy
- Sickness & Absence Policy & Procedure
- Whistleblowing Policy

## 4. DUE DILIGENCE PROCESSES

Sewell Group will conduct a supplier risk assessment to identify where the modern slavery and human trafficking risks within our supply chain exist. Where we identify suppliers with high risks additional measures will be taken to either seek confirmation that our suppliers are not involved with inappropriate practises or organisations, where this confirmation cannot be obtained, we will seek to engage alternative suppliers. Where a supplier does not meet the threshold for legally requiring a modern slavery statement to be in place, we will ensure that they sign and return our legal compliance declaration which includes a statement stating that they comply with section 54 of the Modern Slavery Act.

We conduct our own pre-qualification questionnaire, which has questions specifically designed to gain information on our suppliers' modern slavery arrangements and compliance.

Human Resources procedures and policies ensure that we conduct complaint employment checks and all individuals prior to employing them. Sewell carry out a 'right to work' screening and proof of address for all prospective staff.

We are recognised externally for the level of engagement we have within our business (Sunday Times Top 100 Co. to work for and Queens Award for Enterprise). This engagement is a key element that enables us to effectively communicate with our workforce and gives them the confidence to come forward and report any suspicions they have regarding potential modern slavery risks.



## 5. PROGRESS AGAINST PREVIOUS OBJECTIVES

Sewell Group have had measures in place to manage modern slavery risks in our organisation and supply chain for several years. However, it has only been in the last year that we have formally structured these arrangements. Work we have conducted over the last several years to manage these risks are:

- Right to work checks
- Conducted training across all employees
- Introduced modern slavery compliance in our sub-contractor legal declaration, and then amended this to specified questions in our PQQ process to gather more information from our supply chain on how they manage this subject.
- Modern slavery has become more prevalent in our general policies and arrangements
- We have developed risk assessment processes and KPIs to aid us in the identification, management and measurement of effective arrangements moving forward.



## 6. ASSESSMENT AND IDENTIFICATION OF MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

One of our key objectives for 2024 is to complete a modern slavery risk assessment on our supply chain, as per the due diligence process in section 4.

Findings and actions from this risk assessment that highlight high risk areas will be added to our statements.



## 7. KEY PERFORMANCE INDICATORS AND OBJECTIVES FOR 2024

Key performance Indicator	Target
Employee right to work checks	100%
Employee awareness training complete	100%
Supplier risk assessment	100%
Actions from risk assessment completed	100%

The KPIs set out above are for the financial year 01 Jan 2024 to 31 Dec 2024. These will be tracked throughout the year using our sustainability tracker, and final performance figures will be published in our next Modern Slavery Statement.

Objectives for 2024:

- a. We will conduct a supplier risk assessment to identify areas within our supply chain that are at high risk of involving modern slavery practises.
- b. Develop our Ethical Trading Policy and communicate it to our supply chain and employees.
- c. Suppliers identified as high risk will have further due diligence checks carried out on them, and any additional action required will be taken to remove them from our suppliers list if deemed necessary.
- d. We will ensure all employees are informed of, and know the need to, report any suspicions of modern slavery to the Modern Slavery Helpline on 08000 121 700 or the police on 101.
- e. Maintain all due diligence checks in place at 100% completion.



## 8. TRAINING ON MODERN SLAVERY AND TRAFFICKING

All of our employees are provided with Modern Slavery Awareness Training.

We will raise awareness on the reporting of suspicions, and ensure all employees have easy access to the modern slavery helpline number.

When we have developed our Ethical Trading Policy, we will ensure that it is communicated to all our employees.

This statement was created following the completion of the financial period that it covers. It has been approved by the Sewell Group Board of Directors.

Signed:



Jo Barnes  
Managing Director Sewell Estates

Date: 01/06/2024

