

## Modern Slavery Statement 2019

This statement has been created in line with the Modern Slavery Act 2015 and sets out the steps that Esteem 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. Esteem have a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Our Business

Esteem is a multi-disciplined organisation operating across Hull in Construction, Facilities Management and Investment partnerships.

We have a strong culture and set of values setting expectations of our people to do the right thing, not just for the environment, but for our people, supply chain, communities and business.

### Our Supply Chain

The Organisation has a diverse collection of supply chain companies based across the UK, primarily in the Yorkshire region. All suppliers are required to complete questionnaires and provide business information as part of their registration as a preferred supplier of Esteem which sets out our requirements that suppliers will respect human rights, will not use child labour or forced labour in any form and do not or have not contributed directly or indirectly to human rights abuses.

## Our policies

We operate a number of internal policies across the company to ensure that we are conducting business in an ethical and transparent manner. These are extended to our supply chain and more information on these is outlined below.

1. Anti-Fraud, Bribery & Corruption Policy. This policy states a zero tolerance approach to these behaviours and to the deterrent of inappropriate practices within the business linked to this.
2. Code of Conduct on Company Business Policy. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
3. Equal Opportunities & Dignity at Work Policy. Governed by the Equality act, this policy explains the manner in which we treat and care for our people, customers, supply chain and potential recruits, ensure dignity, respect and fairness is promoted at all levels across the business.
4. Tax Evasion Policy. This policy sets out the various ways that we will ensure that neither the Company, nor its Directors, will be involved in tax evasion behaviour.

## Training

Some training of Directors has already taken place; more will follow during 2019. This will key policy makers and people in influential roles linked to our people, business and supply chain.

## Due Diligence

The Company undertakes an annual review of all supply chain companies. We will consider any potential changes to supply chain and tender processes to ensure adherence to the Modern Slavery Act during our annual reviews.

## Areas of Risk

We recognise the core risks being the supply of goods and services from our major contracting partners. To mitigate this risk, a programme of due diligence will be completed with the annual review and amendments put in place where necessary to ensure appropriate workings.

## Approval for this statement

This statement was approved by the Board of Directors on 1 January 2019

Name: Jo Barnes

Signature: 

Date: 11<sup>th</sup> July 2019