



## **Introduction**

This is the Modern Slavery and Human Trafficking Statement of Osborne group companies ("Osborne") for the financial year ending 31 March 2023. It is published in accordance with section 54(1) of the Modern Slavery Act 2015 (the Act).

Whilst Osborne's projects are UK based, we recognise that modern slavery and human trafficking are not issues that are restricted to projects overseas. Modern slavery and human trafficking exist in the UK and supply chains extend globally.

Osborne is committed to taking appropriate and proportionate steps to ensure that no form of modern slavery or human trafficking is connected to our business and our supply chain. This zero-tolerance approach is outlined in our Modern Slavery Policy.

We have been reviewing and enhancing our approach to Modern Slavery since the introduction of the Act. In 2016, we engaged an external consultant to run a Modern Slavery training and risk assessment workshop with key stakeholders from our group. This assisted in identifying areas to consider, and strengthened our compliance programme. Since the workshop, we have been developing our approach and the steps in place or taken in the financial year ending 31 March 2023 are set out below.

- We have reviewed and updated our Modern Slavery Policy in line with current best practice
- We have shared the updated Modern Slavery Policy with all employees, reiterating our zero-tolerance approach to modern slavery and human trafficking.
- Engagement with the Institute of Business Ethics and the Supply Chain Sustainability School.
- Pre-qualification tools, through Constructionline, were implemented in 2017, and are now fully embedded for the verification of our supply chain partners and contractors.
- We have reviewed our employee onboarding curriculums to include a IHASCO Modern Slavery awareness module a mandatory element of all of our new starters onboarding journey. This module is also available for employees to recap during their employment with Osborne.
- Completed an inherent risk assessment for our high risk supplier categories
- Completed out our reassessment against BES6002 Ethical Sourcing Standard
- Continued our partnership with Protect UK to provide an independent, anonymous whistleblowing service for use by all stakeholders

## **About Osborne – our structure and supply chains**

Osborne is one of the leading privately owned construction and project management businesses based in the UK. We recognise that the construction industry presents a risk of modern slavery and human trafficking.

Our organisation is currently formed of full and part-time employees with a current headcount of under 150 employees. Its make-up ranges between the sectors of: Construction, Developments and Group services Our main office is located in Reigate. Other locations include, Winchester, Hemel Hempstead and Slough. A large proportion of our employees are site based, which means that their location depends on the site they are working on.

Osborne works with a number of subcontractors and consultants across a range of sectors and disciplines. Strong relationships with our subcontractors and consultants, as well as our customers, are



fundamental to our way of working. In addition to subcontractors and consultants, Osborne has a supply chain for the direct sourcing of materials and services. This includes supplies for projects, as well as equipment and services for Osborne's own offices and business. This direct supply chain is almost entirely derived from merchants in the UK, but there are some limited direct purchases from suppliers overseas.

### **Our policies and procedures**

#### **Our values**

Our approach to eradicating Modern Slavery is influenced by our core values of quality, integrity, openness, and being caring and progressive.



#### **QUALITY**

Be professional and do a job of which everyone is proud



#### **INTEGRITY**

Be honest, professional, and straightforward and treat others as you would expect to be treated



#### **OPENNESS**

Be prepared to listen and give constructive feedback and be open to new ideas and different points of view



#### **CARING**

Encourage, support, understand and respect each other



#### **PROGRESSIVE**

Continually adapting and improving to be the best

These underpin every aspect of how we do business. Our aim is to work openly and collaboratively with our customers, supply chain and partners to achieve the very best outcomes whilst ensuring fairness, inclusion and respect for all.

As a family owned business we continue to be driven by a clear desire to work in partnership, solve problems and add value over the long term to create success.

#### **Policies**

We maintain, continuously review and update the following policies in an effort to combat modern slavery and enhance our compliance programme more generally. Our Modern Slavery Policy, which we have recently reviewed and updated, is of most direct relevance. It 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. Our other policies assist by generally encouraging both ethical practices that are consistent with Our Values and the reporting of breaches of policies / related concerns. Each of these policies are stored on PolicyHub, accessible to all employees.

- Being Osborne (inclusion)
- Code of Conduct
- Ethics Policy
- Modern Slavery Policy
- Safety, Health, Environment and Quality (SHEQ) Policy



- Sustainability Policy
- Sustainable Procurement Policy
- Whistleblowing Policy

### Risk assessment

As referred to above we engaged an external advisor to assist with assessing modern slavery risks and to enhance Osborne's policies and procedures.

Human rights abuses can occur at all levels of an organisation, and we have identified that our main area of risk is within our supply chain, which includes agency workers, subcontractors, and the supply chain workforce (Groundworks & Frames, MEP, Drylining, Partitions & SFS, Roofing, Piling & Demolition and Brickwork).

To mitigate these risks, we choose to work with certain contractors / labour providers who have evidenced the implementation of their policies, through right to work checks, site inspections, and any bank account checks undertaken by contractors. We also endeavour to ensure that every supply chain partner is registered and approved through Constructionline, after having evidenced the implementation of their policies. This enables us to assess the most ethical supply chain, and mitigates risk.

Although the fact that our supply chain is UK based facilitates easier and more direct engagement, an ongoing challenge for Osborne has been obtaining greater transparency beyond our first tier partners. To address this risk, we ensure that our suppliers conduct their own modern slavery due diligence, evidenced in their own modern slavery statements.

### Supply chain due diligence

#### *Supply chain Partners*

We recognise the immense importance and value of our collaborative working relationships with our supply partners to combat modern slavery.

Our supplier strategy has been to develop an Osborne supply chain community that shares our company values, as well as promoting and visibly demonstrating these values through behaviours at both a corporate and individual worker level. We endeavour to nurture relationships that encourage our subcontractors and suppliers to adopt our company values and are committed to the highest standards of business ethics, quality and safety performance to help us achieve our business outcomes. We have a structured list of strategic, preferred and approved Supply Chain Partners to assist our efforts in this area.

#### *Due diligence*

Part of our approach to identifying and selecting supply partners is a pre-qualification questionnaire. We are enhancing this by solely using Constructionline as a pre-qualification checking method, in order to strengthen the due diligence process and further reduce this risk of Modern Slavery in our supply chain.



## Learning and awareness

### Learning

We are a partner of the Supply Chain Sustainability School and a supporter of the Institute for Business Ethics. This has enabled us to launch a new modern slavery e-learning, which has been rolled out to the business and has become a mandatory piece of learning for all of our new employees to complete in their first 3 months of employment.

### Awareness

Our zero tolerance approach to modern slavery has been promoted in the financial year through:

- The promotion of our Code of Conduct and related promotion throughout our business. The Code of Conduct contains a section on modern slavery.
- A campaign to promote the issue of modern slavery through posters on-site and in our offices, alongside an electronic outreach.
- Articles in our newsletter, which reaches all Osborne employees, outlining the importance of the eradication of Modern Slavery.
- A newsletter is produced and distributed to our supply chain which includes content on Modern Slavery and best practice examples.

## Measuring effectiveness

Whilst we have not identified any instances of modern slavery on our sites, we recognise that modern slavery can be hidden in supply chains. Our approach to modern slavery will continue to be reviewed and monitored, including by reference to our Sustainable Procurement Policy.

## Next steps

We understand that modern slavery risks are not static and that more can always be done. We endeavour to continue to mitigate modern slavery risks in the years to come through continually reviewing our approach.

Currently we are working towards:

- Engagement on the issue with the GLAA (Gangmasters & Labour Abuse Authority) and a leading NGO, Stronger Together.
- Working towards making our modern slavery communications (posters on-site and in office, both physical and electronic) more inclusive (multilingual messaging). The communications will also be enhanced through the inclusion of further detail on how to spot red flags and what action to take.
- Expanding due diligence on subcontractors and suppliers and the introduction of related clauses into contracts.
- Continuing to enhance our pre-qualifications tools, right to work checks and recruitment checks.
- Continue to deliver training to our supply chain on Modern Slavery through Supply Chain Sustainability School
- Continually review our risk inherent assessment and develop action plans to further mitigate risks

## Modern Slavery Act Transparency Statement



for high risk trade categories (tier 1 suppliers)

- Develop a supply chain mapping protocol for tier 2 supply chain and below
- Development of a supply chain code of ethics to ensure it is line within current best practice

**Approved by Board of Directors on 5<sup>th</sup> June 2023 and signed by CEO Dave Smith for the following companies:**

Geoffrey Osborne Limited and its subsidiary companies, including:

- Osborne Construction Limited
- Osborne Developments Holdings Limited

To raise concerns:

- Guidance on reporting suspected slavery can be found at the Home Office's website: [www.modernslavery.co.uk](http://www.modernslavery.co.uk).
- Suspicions of modern slavery existing or being connected to Osborne's business or supply chain can also be reported to your line manager, any senior leader, the People Team, Group People Directors or to the Ethics Committee.
- Our external whistleblowing hotline 'Protect' is available to you to raise concerns: phone: 0207 4046609 or email: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)
- National helplines (any language) and reporting:
  - Modern Slavery Helpline – 0800 0121700 (24 hours) or [www.modernslaveryhelpline.org/report](http://www.modernslaveryhelpline.org/report)
  - GLAA – 0800 4320804 (08:00 – 16:00) or email: [intelligence@gla.gov.uk](mailto:intelligence@gla.gov.uk)
- If you're worried that the individual is in immediate danger, phone 999.

*Dave Smith*

**Dave Smith, Chief Executive, Osborne June 2023**