

## Modern Slavery Act Transparency Statement



This is the Modern Slavery and Human Trafficking Statement of Osborne group companies ("Osborne") for the financial year ending 31 March 2019. 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 is not an issue that is restricted to projects overseas. Modern Slavery exists 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 is connected to our business and our supply chain. This zero-tolerance policy 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 2019 are set out below.

- The establishment of an Ethics Committee, to deal with all ethical issues, including modern slavery.
- The development of digital right to work checks on our sites, currently being tested on select sites.
- Engagement with the Institute of Business Ethics and the Supply Chain Sustainability School.
- Pre-qualification tools, through Constructionline, were implemented in 2017, and fully rolled out in August 2018, for supply chain partners and contractors.

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

Osborne is one of the leading privately owned construction and project management businesses based in the UK.

Our organisation is currently formed of full and part-time employees. Its make-up ranges between the sectors of: Construction, Developments, Group services, Infrastructure, Osborne Homes Limited (OHL), Osborne Property Services Limited (OPSL) and Innovare. Our main office is located in Reigate. Other locations include London Borough, Sloane Square, Winchester, Rugby, Slough and Waterloo. A large proportion of our employees (46%) 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.



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## 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.

*“Osborne is a family business, moulded out of a strong sense of respect and dedication to our customers. We are driven by our values to have a positive impact on the environments we exist in. Therefore, it is important to us to tackle modern slavery as best we can, in the hope of eradicating it for good. Unfortunately, with an ever-globalising world and the employment market becoming more fragmented, a great number of people are at risk of enslavement and abuse, making Osborne’s challenge even more imposing. We are determined to work with our supply chain to ensure that everyone involved in our business has the respect and dignity they deserve.” – Andy Steele, CEO*

### Policies

We maintain the following policies in an effort to combat modern slavery and enhance our compliance programme more generally. Our Modern Slavery Policy is of most direct relevance, however, 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
- Code of Conduct



- Ethics Policy
- Modern Slavery Policy
- SHEQ Policy
- Sustainability Policy
- Sustainable Procurement Policy
- Whistleblowing Policy

### **Risk assessment**

As referred to above, in 2016 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 (groundwork's & RC Frame, Steel Frame, Mechanical & Electrical, Curtain Walling, Cladding, Brickwork, Roofing, Scaffolding, Dry lining, Carpentry & Joinery, Architectural Metal, Flooring Finishes). 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. In 2016, we sent out a questionnaire, focused explicitly on modern slavery, which enabled us to review our contract terms with our supply chain.

### **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 seeking to enhance this and, since 2018, we have been 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.



### *Right to Work (RTW) checks*

Osborne recently conducted a trial at one of our sites outside London, to implement a technology to identify forged documents by scanning them. This technology is expected to make our RTW checks more airtight. To increase the likelihood of successful implementation and to collect more information, we have recently conducted a second trial on a London site. This trial was implemented as the project commenced on-site, and has yielded positive results, as well as having identified areas of improvement. Therefore, we are working on minor technical adjustments before rolling it out business-wide.

### **Learning and awareness**

#### *Learning*

Further to the risk assessment workshop referred to above, in October 2016, we became a partner of the Supply Chain Sustainability School and a supporter of the Institute for Business Ethics in 2019. This has enabled us to draft new modern slavery e-learning, which we are looking to roll out in the coming financial year.

#### *Awareness*

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

- The release of our Code of Conduct in October 2018, 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.

### **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 and under the oversight of our Ethics Committee. To ensure that our processes are effective, we have been conducting trials for a right to work checking technology, MSite, on two of our sites, with the view of rolling it out business-wide in the near future. This is expected to remove the majority of human error regarding RTW checks. Additionally, we are looking to measure the effectiveness of PpAC technology systems, with a view to encouraging our supply chain to adopt the technology.

### **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:



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- Engagement on the issue with the GLAA (Gangmasters & Labour Abuse Authority) and a leading NGO, Stronger Together.
- Continuing discussion on modern slavery at each of our quarterly Ethics Committee meetings.
- 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.
- Introducing an e-learning module for all Osborne employees, which will be a mandatory part of induction.

**Approved by Board of Directors on the 5<sup>th</sup> of September 2019 and signed by CEO Andy Steele for the following companies:**

Geoffrey Osborne Limited and its subsidiary companies, including:

- Osborne Construction Limited
- Osborne Infrastructure Limited
- Osborne Homes Limited
- Osborne Property Services Limited

Osborne Development Holdings and its subsidiary companies

Innovare Systems

**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 404 6609 or email: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)
- National helplines (any language):
  - Modern Slavery Helpline – 0800 0121700 (24 hours)
  - GLAA – 0800 4320804 (09:00 – 17:00)
- If you're worried that the individual is in immediate danger, phone 999.

**Andy Steele, Group Chief Executive, Osborne 5<sup>th</sup> September 2019**