



Introduction

This is the Modern Slavery and Human Trafficking Statement of the Osborne group companies ("**Osborne**") for the financial year ending 31st March 2022 to prevent human trafficking and slavery in our business. It is published in accordance with section 54(1) of the Modern Slavery Act 2015 (the Act). The full Act is available [here](#).

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Foreward

Osborne is committed to providing sustainable, intelligently designed spaces that improve people's lives, and modern slavery has no place in our business or supply chains.

Modern slavery is a largely concealed crime and involves one person denying another person their freedom. This can take many forms, including human trafficking, servitude and forced or compulsory labour, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

While it is easy to think of modern slavery as something that we are far removed from, there are an estimated 136,000 victims of forced labour in the UK¹, and an estimated 40.3 million² victims worldwide. Clearly, the challenge of eradicating modern slavery remains, and Osborne is committed to ensuring that effective systems and controls are in place to ensure modern slavery is not taking place anywhere within our business. We are determined to work with our supply chains to ensure that everyone involved in our business is treated with the respect and dignity that they deserve.

Though no sector is immune, the construction sector is particularly vulnerable to modern slavery due to fragmented supply chains, a high reliance on short-term labour and a fluctuating workforce. Since the implementation of the Modern Slavery Act 2015, which highlighted the need for UK businesses to tackle modern slavery in their supply chains, we at Osborne have continuously sought to refine our approach to tackling the occurrence of modern slavery and making a genuine contribution to its eradication.

A collaborative approach is essential in our combating this form of exploitation given the size of the construction industry, which includes our customers, supply chain partners and experts in the field, as well as the government and public authorities. We are committed to regularly reviewing our processes, procedures and training, to ensure that they remain fit for purpose.

We recognise that a distinct area of weakness lies in the onward supply chain, as subcontractors add a layer of separation between us and those that are working on our contracts. That is why we invest in ensuring our supply chain partners meet the standards that we set through ConstructionLine and CAS. These provide us with assurance that they are taking the issue seriously by requiring our suppliers to complete a pre-qualification questionnaire regarding the way they do business. This enables us to ensure that they are compliant with relevant laws and aligned with our values.

This statement provides details of our actions and efforts that we have made in 2021 to reinforce our programmes and reduce the likelihood of modern slavery occurring in our business and our supply chain. It also sets out the steps we will take in 2022 and beyond, to further strengthen our approach.

Dave Smith, Chief Executive – 1st March 2022

¹ Global Slavery Index <https://www.globallslaveryindex.org/2018/findings/country-studies/united-kingdom/>

² ILO <https://www.ilo.org/global/topics/forced-labour/lang-en/index.htm>



About Osborne: Business, Workforce and Supply Chains

About Osborne

Osborne is a family business, moulded out of a strong sense of respect and dedication to our customers. We are driven by our purpose and values to have a positive impact on the environments we work in. Therefore, it is important to us to tackle modern slavery as best we can, in the hope of eradicating it for good.

Our values

Our approach to eradicating Modern Slavery is influenced by our core values of: quality, integrity, openness, and being caring and progressive. These values 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, improve people's lives, solve problems and add value over the long term to create success. We have a zero-tolerance policy to slavery and human trafficking.



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

Our purpose

Our purpose is to provide sustainable, intelligently designed spaces, that improve people's lives. We pursue a self-development led business, which delivers better outcomes across every stage of our lifecycle. This purpose, along with our values, dictates the way we do business and encourages greater individual responsibility and accountability. We endeavour to consistently make ethical and sustainable decisions.

Our workforce

Osborne is one of the leading privately owned construction and project management businesses based in the UK. Our organisation is currently formed of around 524 full and part-time employees. Our operating businesses are: Construction, Developments, Property Services and Innovare. Our main office is located in Reigate. Other office locations include London, Coventry, Winchester, Slough, Hemel Hempstead, and Littlehampton as well as numerous construction sites around southern England. 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 direct purchases from suppliers overseas.

Whilst Osborne's projects are only UK based, we recognise that modern slavery exists in the UK and our 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 reviewed and attuned our approach to tackling 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 further developed our approach to these issues and further detail of the steps in place during the financial year ending 30 September 2021 are set out below.

- Information about modern slavery is included in all site inductions, and we train our site employees on the signs to look out for and how to report concerns about modern slavery both internally and externally to our organisation.
- Learning modules on modern slavery are available to all employees on our Osborne LMS (Learning Management System).
- A section on modern slavery is contained in our Osborne Code of Ethics with the purpose of raising awareness and recognising the importance of the subject.

Our supply chain

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 encourage our subcontractors and suppliers to align with our company values and commit 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.

Osborne has a supply chain of around 1200 valued partners, a number of whom, we have worked in partnership with for over 20 years. They include large multinational companies, micro businesses and social enterprises.

We spend 80% of our revenue in procuring goods and services from our supply chain. In 2020, our net spend with these partners was £290m: 45% of this spend was with our top 100 preferred supply chain community members.

We have regular contact with these supply chain partners via business to business, quarterly performance reviews, which allows us to see first-hand how they operate. During 2020, we undertook additional contact to understand the challenges they were facing due to COVID-19, including infection rate and resource level monitoring and sharing best practice, such as the CLC SOP. These methods enabled us to identify specific ways to support our supply chain during the pandemic, and to uphold business continuity planning.



Our work is project-based, and some of our projects last for a number of years, whilst others may only take a few weeks. These short-term projects have the potential to create a higher risk of modern slavery, should we engage in new supply chain relationships. To manage this risk, we ensure that we take time to understand and assess the processes or procedures of new supply chain partners.

Part of our approach to identifying and selecting supply partners is a pre-qualification questionnaire. We are streamlining this process by 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.

In 2020, 99% of our spend was with companies registered in the UK. 12% of our spend was with material suppliers and 88% was with subcontracts, though our subcontractors often purchase materials on our behalf.

Modern Slavery and Osborne Responsibility

The Modern Slavery Act 2015 was introduced to consolidate and clarify modern slavery offences; toughening penalties and prosecution; and introducing greater support and protection for victims. The concept of forced or compulsory labour is most relevant to this statement. This is because it is the form of modern slavery which our business and suppliers are most likely to encounter that require tackling.

At Osborne, we are committed to sustainable development. We use the United Nations Sustainable Development Goals (SDGs) as guidance when working to prevent and eradicate modern slavery in our sector. These include SDG Target 8.7 which is the most directly relevant, stating *'Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.'* SDG Target 1 also aims to eradicate poverty, because the low level or absence of wages in modern slavery plays a direct part in exacerbating the poverty cycle. SDG Target 5 focuses on achieving gender equality, because women are overrepresented in forced labour representing 59% of forced labourers. SDG Target 12 addresses responsible consumption and production, both of which are directly impacted by modern slavery.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers, and other business partners, and as part of our contracting processes we include specific prohibitions against the use of forced, compulsory or trafficked labour.



Speaking up about Modern Slavery

Modern slavery is an issue that persists in the construction industry, and we must work together to eradicate it. "Speaking up" is an important part of this process, and it is crucial to our long-term success. All of our employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage, so that we can address issues as early as possible.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You must avoid any activity that might lead to, or suggest, a breach of this statement, and you should notify us as soon as possible if you believe or suspect that a conflict with this statement has occurred or may occur in the future.

The freedom and safety to raise concerns is another core component of an ethical business culture. Each of us, no matter our role or level, is empowered to raise concerns and express ourselves freely. Speaking up when something doesn't feel right shows integrity and courage.

If you report a concern, it will be handled appropriately and with complete confidentiality. We will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business or any of our supply chains. If you believe that you have suffered any such treatment, you should inform us immediately.

How to raise a concern:

- Suspicions of modern slavery existing or being connected to Osborne's business or supply chain can be reported to your line manager, any senior leader, the People Team, Group People Director or to the Ethics Committee.



- Our external Speak Up hotline called 'Protect' is available to raise concerns: **phone:** 0207 4046609 or **email:** whistle@protect-advice.org.uk
- Further guidance on reporting suspected slavery can be found at the Home Office's website: www.modernslavery.co.uk.
- National helplines include:
 - o Modern Slavery Helpline – 0800 0121700 (24 hours); and
 - o GLAA – 0800 4320804 (09:00 – 17:00).
- If you're worried that an individual is in immediate danger, phone 999.

Progress and Milestones on Tackling Modern Slavery in 2021

These are the steps that Osborne has taken in the last 12 months to combat modern slavery in our business and supply chains:

- In 2020, modern slavery remains a central discussion at each of our quarterly Ethics Committee meetings
- In 2021, we are delighted to have achieved the BRE Environment and Sustainability BES 6002 Ethical Sourcing Standard, which provides third party assurance of our practices and provides a maturity pathway to make continuous improvements.

Partnerships, Training & Education

- In 2020, we partnered with the Supply Chain Sustainability School to further our learning and training. We integrated relevant e-learning modules into our inductions and shared these with our suppliers.
- Since 2019, we have continued to engage with the Institute of Business, the GLAA (Gangmasters & Labour Abuse Authority) and a leading NGO, Stronger Together, ensuring that we meet best practice standards.
- Since 2019, we have continuously updated our modern slavery communications (posters on-site and in office, both physical and electronic) and focused on ensuring they are more inclusive (multilingual messaging). The communications have also been enhanced through the inclusion of further detail on how to spot 'red flags' and what action to take.

Pre-Qualification

- In 2020, we fully rolled out our pre-qualification tools, through Constructionline, for supply chain partners and contractors. These provide us with the assurance that our suppliers are also driven to abolish modern slavery. These include a mandate for our suppliers to comply with modern slavery legislation,



as well as requiring our suppliers with over £36 million turnover to provide us with their modern slavery statements.

- In 2020, we adopted the Common Assessment Standard (CAS). A key element of this pre-qualification tool is ensuring that the organisation can demonstrate how it has considered the legal requirements of workers' rights and/or ethical labour criteria as part of its supply chain management. This builds on our previous requirements of all subcontractors being required to hold the Constructionline Gold standard, as this is encompassed within CAS.

Osborne's Strategic Approach to Tackling Modern Slavery

Osborne adopts a preventative approach to tackling modern slavery. Our approach to confronting 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. The key components of this strategy are fostering collaborative relationships with our supply chain, identifying risk areas, measuring effectiveness, seeking external validation, employing robust policies and ensuring that all of our people are properly educated on the topic.

Preventative approaches

GLAA: Construction Protocol

Osborne is a signatory of the Gangmasters & Labour Abuse Authority's Construction Protocol. The document commits signatories to:

- Work in partnership to protect vulnerable workers;
- Agree to share information, where possible, to help stop or prevent the exploitation of workers;
- Work together to manage information sensitively and confidentially;
- Commit to raising awareness within the supply chain; and
- Maintain momentum through this protocol by communicating regularly.

In becoming a signatory of this protocol, we have agreed to raise awareness within supply chains to help to prevent and protect workers from exploitation and abuse. In addition, we will take necessary steps to ensure that exploitation and abuse of workers is recognised and addressed with appropriate safeguards put in place to ensure that exploitative practice is not repeated.

ConstructionLine, Common Assessment Standard & Build UK

Osborne is a Gold Member of ConstructionLine. This membership enables ConstructionLine to conduct a number of validation checks on our supply chain and business, using an enhanced prequalification questionnaire that goes beyond a standard prequalification questionnaire such as PAS 91. The assessment includes examining our credentials for environmental management, quality management, equal opportunities, modern slavery act adherence and anti-bribery and corruption policies.

Furthermore, we use the Common Assessment Standard, developed by ConstructionLine and Build UK, which is a standardised set of questions crafted from existing systems (like PAS 91) and from expert input from clients, suppliers and trade organisations. This standard is championed by Build UK and the Civil Engineering Association (CECA).



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 conducted trials for a right-to-work checking technology, MSite, on two of our sites and we aim to review its effectiveness in 2022.

External validation

In order to gain third party assurance, we have partnered with a number of organisations which have assessed our efforts in the prevention of modern slavery. These organisations and standards include:

- ISO20400 Sustainable Procurement Standard
- BRE Environment and Sustainability Standard BES 2001 Ethical (TBC)
- BRE Environment and Sustainability Standard BES 6002 Ethical Sourcing
- Institute of Business Ethics

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
- Ethics Policy
- Living our Values: Osborne's Code of Ethics
- Modern Slavery Policy
- Recruitment policy
- SHEQ Policy
- Sustainability Policy
- Sustainable Procurement Policy
- Whistleblowing Policy

Learning and Awareness

Learning

We are a partner of the Supply Chain Sustainability School (SCSS) and a supporter of the Institute for Business Ethics. This has enabled us to draft new modern slavery e-learning materials, which we are looking to roll out in the coming financial year. What's more, our internal learning management system has increased our ability to provide education related to modern slavery prevention.

Awareness

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

- The promotion of our new Code of Ethics and related promotion throughout our business. The Code contains a section on modern slavery.



- Campaigns to promote the issue of modern slavery through multilingual 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.
- Compulsory learning in induction about modern slavery, sources from the SCSS

Looking ahead – Next Steps in Mitigating Modern Slavery 2021 - 2022

Osborne aims to continually progress and improve. That's why we are aiming to take further steps to prevent modern slavery from occurring in our supply chains. In 2021/2022, we are working on the following:

- We are currently expanding due diligence on subcontractors and suppliers and the introduction of related clauses into our contracts.
- We have undertaken the BRE Ethical Labour Sourcing Assessment BES6002 and are aiming to bring every section up to a Level 2.
- In 2022, we aim to further our commitments by creating a Supplier Code of Conduct, in order to ensure that our suppliers know that we expect the highest standards and vigilance from our supply chain partners and their onward supply chain.
- In 2022, we aim to make the fight against modern slavery a more collaborative effort. To do this, we are partnering with our suppliers and competitors in the sector, to share best practice in preventing any type of modern slavery in our supply chains.
- In 2022, we aim to conduct a risk assessment to identify key areas of risk. This will enable us to create an action plan for targeting these risks more efficiently.
- In 2023, we aim to build upon our risk assessment and carry out a supply chain mapping exercise. This will enable us to gain further transparency throughout our supply chain.

Conclusion

We listen and take action. Speaking up is an essential first step in doing this. We will appropriately investigate any concern regarding modern slavery. If you would like to learn more about our investigation process, and your options for anonymous reporting, contact the People Team, the Ethics Committee or our impartial advice line on 0207 404 6609 or whistle@protect-advice.org.uk Remember that Osborne is committed to caring for and protecting our people against retaliation.

Any person who violates this statement, Osborne' Code of Ethics or policies and procedures will be held accountable. It is the responsibility of those in the reporting line to address issues that are brought to their attention. If any person directs or approves violations or has knowledge of them and does not promptly move to correct them, they will be held accountable. We are each responsible for cooperating during the investigation process. Failure to comply may result in disciplinary procedures.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Osborne's slavery and human trafficking statement for the financial year ending in September 2022.



This statement is approved by Board of Directors on the 24th February 2022 and signed by Dave Smith for the following companies: Osborne Group Holdings Ltd and its subsidiary companies, including:

- Geoffrey Osborne Limited (00873093)
- Osborne Homes Limited (10453375)
- Osborne Construction Limited (10735247)
- Osborne Property Services Limited (05756266)
- GCHOHoldings Limited (07543585)
- Osborne Developments Holdings Ltd (08493546)
- Innovare Systems Limited (05472264)
- Geoffrey Osborne Developments (South) Limited (07784471)
- Flexihomes Ltd (12170033)
- Reigate No.1 Limited (08755874)
- Fishbourne No2 Limited (07784474)
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Signed by

Dave Smith, Chief Executive, Osborne – 1st March 2022