



Tilbury Douglas Holdings Limited

Modern Slavery Act 2015 Statement for the financial year ending December 2022

1. About this statement

Tilbury Douglas Holdings Limited and its subsidiaries, together the Tilbury Douglas Group, including Tilbury Douglas Construction Limited and Tilbury Douglas Engineering Limited became a standalone business following separation from Interserve Group Limited on 27th May 2022.

This modern slavery statement describes the activities we have undertaken to mitigate risk in the financial year ending 31st December 2022.

We are committed to ensuring that slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery") are not present in any form in our business, our relationship with our workforce or the workforce of our direct and indirect suppliers and subcontractors (the "Supply Chain").

2. Structure and Operations

With over 130 years of experience in the construction and engineering sector, we are a leading UK building, infrastructure, engineering and fit-out company, working for both the public and private sector.

We deliver projects across a range of sectors including health, education, highways, justice, defence, aviation, water and environment, often contracted under framework arrangements.

Geographically, our business consists of Regional Building, which is structured regionally into the North and Scotland, Central, and the South; our national Infrastructure Business and our national Engineering Business.

Having our own in-house engineering business and operating under our integrated working model means we are able to reduce the risks associated with a more traditional approach to construction by providing greater collaboration and certainty of delivery.

At the end of financial year ending 31st December 2022, we employed c. 1,200 employees operating predominantly in the UK.

Details of our business can be found on our website www.tilburydouglas.co.uk

3. Supply chain

We understand the important role our supply chain partners play in delivering our projects and that our reputation can often be dependent upon them providing a service which is aligned with our own values and goals, including their approach to modern slavery and human trafficking.

Our supply chain is diverse - the regional nature of our business means that during our financial year there are up to 3,200 supplier and subcontractor partners providing goods and services to our projects and regional offices. There are a wide range of categories including architects and designers; subcontractors such as M&E, drylining and groundworks; direct material supply such as concrete and builders' merchants; plant and equipment hire and IT and corporate services.

We work hard to develop long-term relationships and work collaboratively with our supply chain at all stages of project delivery, to better understand risks and take appropriate action where required.

4. Relevant policies

This statement is underpinned by and should be read in conjunction with the following policies which support our aim to ensure that Modern Slavery does not occur in our business or in our Supply Chain:

- Tilbury Douglas Group Policy on Anti-Slavery and Human Rights
- Tilbury Douglas Group Policy on Whistleblowing
- Tilbury Douglas Group Policy Statement on Sustainability
- Tilbury Douglas Group Policy on Anti-Bribery and Corruption
- Conducting Business with Tilbury Douglas

These policies can be found on our website www.tilburydouglas.co.uk

The Board has appointed a designated Director who is responsible for the production of this modern slavery statement and for overseeing compliance with applicable policies.

5. Assessment of the risk

Risk management oversight is through our Group Executive Board, which meets quarterly to consider material risks to the business and the appropriate measures to be implemented to minimise the occurrence, and mitigate the impact, of such risks.

We have established a risk assessment process across our business, using a range of criteria to undertake the analysis. During the reporting period we identified potential areas of risk of modern slavery and human trafficking due to the diverse and complex nature of supply chain and due to the challenges with labour provision, as follows.

1. Supply chain category or trade. In the construction sector contracts are often cost driven and this competitive environment can often reward lowest price. This may result in risk from exploitation of workers in certain trades. Recent supply chain disruption, the volatility of costs and labour supply shortages can all potentially contribute to increased risk through organisations attempting to remain competitive.
2. Geography, where although our work is UK based and mostly UK sourced there may be risk inherent in complex geographical supply chains. An example of this is the solar panel industry where we have taken significant steps recently to improve our due diligence practices.
3. Labour provision, where availability remains a challenge. We recognise that there is an ongoing skills shortage that has been exacerbated by the pandemic and changing immigration rules. Construction employs a wide range of skills but at lower and entry level, roles may be unskilled, and it may be a challenge to ensure that the documentary evidence demonstrating compliance and capability is in place for all workers. The rising cost of living may also compound worker vulnerability.
4. Complex supply chain tiers, where there can be limited visibility of the contracting party further down the supply chain, and subcontracts can often be further subcontracted. Given the range of roles within Construction, there are many routes to securing employment including direct employment, temporary labour and indirect or subcontracted workers.

6. Actions taken to address the risk

We are continually looking for ways to improve our processes and approaches to the management of modern slavery risk. Some of the actions we have taken during the 2022 financial year are highlighted below.

- (a) We have fully implemented our supplier due diligence and pre-qualification platform which is aligned to the Common Assessment Standard and where requested we provide support to our subcontractors to enable them to achieve the required level.
- (b) We have introduced enhanced processes and documentation for subcontractor appointment due diligence, with a focus on the diligence undertaken in the event that subcontractors intend to sub-subcontract elements of the service they are providing.
- (c) Our subcontract terms have been enhanced to include obligations on our subcontractors to comply with our policies, including our Group Policy on Anti-Slavery and Human Rights.
- (d) We have carried out full audits of our key labour providers to ensure compliance with all relevant legislation and with our requirements. These audits are now planned to be carried out annually.
- (e) We have implemented enhanced due diligence practices around the selection of solar panel suppliers, either directly or through our subcontractor including written assurances to determine the country of origin, the risk associated with that country and the likelihood that Modern Slavery or Human Rights abuse is prevalent in that country. During any tender pricing activity, we will ask for additional written assurance from our partners and suppliers that they have also assessed the risks of their material and product choices. Where building performance requirements (Net Zero Carbon in operation) means that renewable energy is required to comply with the contracted scope, we will highlight the risk to our customers and agree an acceptable strategy.
- (f) We have ensured the continuation and enhanced profile of our independent, confidential mechanism for whistleblowing / grievance reporting, which is open to use by both our employees and our Supply Chain and to third parties
- (g) We have continued with our mandatory training (both on induction and periodically thereafter) to all managers and those with specific sourcing responsibilities. This has also been enhanced by additional Director commitment training for 50 senior leaders.
- (h) We have undertaken Licence to Recruit training for line managers to ensure fair recruitment practices and ensure all the checks are undertaken.
- (i) Through our HR onboarding processes we undertake right to work checks on new starters to ensure that they are eligible to work in the United Kingdom. In addition, we employ a 3rd party Vetting organisation to undertake BPSS checks which includes identity check, employment history check, employment reference check and basic criminal record checks.
- (j) We have fully implemented software which validates individuals' relevant permits, accreditations and competencies of individuals working on site including providing clarity on individuals employers.
- (k) Post our separation from Interserve Group we have demonstrated our commitment to fair and open payment practices by signing-up to the Prompt Payment Code.

7. A look ahead

We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking and our approach will continue to evolve as we mitigate the risk through the actions outlined above. For the coming financial year, we will consider the following.

Internally

For those areas identified as high risk we will carry out a supply chain mapping exercise to map the end-to-end supply chain to review and mitigate any risk identified both within our and our suppliers' supply chains.

We will provide enhanced training to our mental health first aiders to help them identify the signs of modern slavery.

We will be introducing an on-site subcontractor audit to audit subcontractor labour provision to ensure compliance with precontract agreements on sub-subcontracting.

We will be implementing enhanced due diligence around right to work check of new recruits using digital onboarding.

Enhanced reporting and dashboards including Further developing KPIs to assess the effectiveness of our management of the modern slavery and human trafficking risks associated with our business

Externally

We will continue to build-on our success in social value within local communities to allow us to use knowledge, experience, and resources to support smaller organisations to put the right procedures in place to tackle Modern Slavery

We intend to further develop our Modern Slavery and labour exploitation policy and framework including an assessment against British Standard BS25700, Organisational Response to Modern Slavery.

We will continue to actively engage with all suppliers to support their management of the risk of Modern Slavery, supporting continuous improvement towards combatting Modern Slavery.

8. Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Modern Slavery Statement for and covering the twelve months of the financial year ending 31st December 2022.

It was approved by the board on 26th June 2023.



Paul Gandy
Chief Executive
Officer



Craig Tatton
Chief Operating
Officer



George Restall
Finance Director



Martyn Smith
Commercial
Director