

Modern slavery statement

Organisation

This statement applies to Total Construction Supplies Ltd (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year 2022-2023.

Organisational structure

A leading British manufacturer and supplier of steel reinforcement and building accessories, Total Group currently employs more than 200 staff, all passionate about helping you get what you want when you want it and within the right budget. Demand for our product is consistently high throughout the year and is therefore not seasonal.

Established 25 years ago, the company has become a foremost authority and contributor to the UK’s infrastructure working alongside some of the sectors largest construction companies. The business continues to grow and implements training and career progression for all of its workforce throughout the West Midlands and beyond.

Total adopts a responsible approach to the business, applying maximum attention to safety, sustainability, the environment and the larger community.

Controlled by a Board of Directors and currently employing c.200 staff across 4 sites in the Midlands, Total are proud to source their employees from the local communities in which they are based and also work in conjunction with HM Prisons to offer opportunities to prison leavers and those released on temporary licence.

The labour supplied to the Organisation in pursuance of its operation is carried out in the UK predominantly in the West Midlands and Derbyshire.

Definitions

The Organisation considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases exceeds those minimums in relation to its employees.

Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to the supply of steel products and goods from various suppliers in the United Kingdom, Spain, France, Turkey, UAE, Holland and Greece.

We understand that the Organisation's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

Potential exposure

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in Turkey, with a current estimated prevalence of modern slavery of c.15.6 (www.walkfree.org/global-slavery-index, n.d.) per 1000 people and the UAE with a prevalence of 13.4 per 1000 people. This is due to the threat of the supply chain involving the provision of labour in countries where protection against breaches of human rights may be limited.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- We have conducted a comprehensive supplier review to address how our supply chain is currently ensuring modern slavery is not present within the supply chain workforce. This is evidenced and retained for future reference.
- Our Board, Senior Management team, Procurement and Accounts teams are all provided with mandatory interactive Modern Slavery training via our e-learning portal, in order to embed a zero-tolerance policy towards modern slavery.

The following steps will be in place prior to our next statement;

- The Organisation recognises the need for supplier contracts that will include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery. In

order to address this the Organisation is reviewing their Purchasing and Receipt procedure in line with our Integrated Management System. (IMS-017).

- We are currently introducing a supplier risk assessment for new suppliers (via our Integrated Management System (IMS-017-FRM-A)

Key performance indicators

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

- The Organisation expects its employees to familiarise themselves with our Ethics policy etc, which is issued via the Employee Handbook at Induction.
- Employees are expected (where applicable) to undertake any training and refresher courses on the prevention of Modern Slavery.
- The Organisation has produced an action plan that sets out the organisation's commitments over the next 12 months and aligns KPIs with those commitments.
- The effectiveness of the interactive training is assessed via an examination at the end of the course. If the mark is insufficient, the employee must re-take the course until a satisfactory level is achieved.
- The Organisation will actively monitor any existing and new suppliers for compliance with our audit processes regarding the prevention of Modern Slavery. Those found to be non-compliant will be removed from the approved supplier list.
- Our Procurement and Quality departments are working closely together to produce an audit process to encompass Modern Slavery prevention. The process is currently internal; however, the Organisation actively engages with its own Customers to share knowledge and practice on current procedures.

Policies

The Organisation has the following policies which further define its stance on modern slavery

- Business Ethics policy
- Recruitment and Selection policy
- Conditions of Service
- Performance Related Pay policy
- Equal Opportunity Policy statements
- Responsible Sourcing policy

The Organisation intends to implement the below prior to our next statement;

- Information on how employees, suppliers etc. can access relevant policies (including where their native language is not English and/or local literacy rates are low)
- Enforcement mechanisms and sanctions for non-compliance with policies, including human trafficking and slavery
- Policies on freedom of association and collective bargaining

Training

The Organisation provides the following training to staff to effectively implement its stance on modern slavery

1. During induction training via the Employee Handbook
2. Within Total Group we have made MODERN SLAVERY ACT INTERACTIVE mandatory training for Directors and senior management on our E-learning platform
3. Our provider is SAFETY MEDIA (www.safetylearning.co.uk)
4. Objectives/outcomes covered are - What is modern slavery? The Modern Slavery Act 2015, who is becoming enslaved? Modern Slavery Act provision, three elements of trafficking, recognising modern slavery, recognising the signs, steps to assess and manage the risks, reporting modern slavery
5. All learning is completed on our e-learning platform
6. We have a group skills matrix evidencing completed e-learning
7. All e-learning is refreshed annually

Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, Joseph Law, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval:

Signed: 18.12.2023



Print name: Craig Gibbons

Job Title: COO

Date: 18.12.2023