

## **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 2023-2024.

### **Organisational Structure**

A leading British manufacturer and supplier of steel reinforcement and building accessories, Total Group currently employs 168 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 sector's 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 168 staff across 3 sites in the Midlands, Total is proud to source employees from the local communities in which they are based. The Organisation also works 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 having restrictions 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 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 per 1000 people, and the UAE with a prevalence of 13.4 per 1000 people ([www.walkfree.org/global-slavery-index](http://www.walkfree.org/global-slavery-index)). 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 in 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:

- 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.
- Provided mandatory interactive Modern Slavery training via our e-learning portal to the Board, Senior Management team, Procurement, and Accounts teams to embed a zero-tolerance policy towards modern slavery.

### **Ongoing and Future Commitments**

The Organisation has committed to implementing the following measures prior to its next statement:

- Updating supplier contracts to include termination powers in the event that the supplier is, or is suspected to be, involved in modern slavery. This is being integrated into the Organisation's Purchasing and Receipt procedure (IMS-017).
- Introducing a supplier risk assessment for new suppliers via the Organisation's Integrated Management System (IMS-017-FRM-A).
- Actively monitoring existing and new suppliers for compliance with audit processes regarding the prevention of modern slavery. Non-compliant suppliers will be removed from the approved supplier list.
- Producing an audit process in collaboration with the Procurement and Quality departments to encompass modern slavery prevention. The Organisation will engage with customers to share best practices.

### **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:

- Employees are expected to familiarise themselves with the Ethics policy, issued via the Employee Handbook at Induction.
- Mandatory completion of training and refresher courses on the prevention of modern slavery.
- Action plan with defined commitments and KPIs aligned with modern slavery prevention goals.
- Assessment of the effectiveness of interactive training through examinations, with mandatory retakes if the required standard is not achieved.

## Policies

The Organisation has the following policies that 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

Planned updates include:

- Providing information on how employees and suppliers can access relevant policies, including where literacy or language barriers exist.
- Establishing enforcement mechanisms and sanctions for non-compliance with policies.
- Developing 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. Induction training via the Employee Handbook.
2. Mandatory interactive Modern Slavery Act training for Directors and senior management, provided via our e-learning platform.
3. Training objectives include:
  - Understanding modern slavery and the Modern Slavery Act 2015.
  - Recognising the signs of modern slavery and reporting it.
  - Steps to assess and manage risks.
4. All training is completed and tracked via a skills matrix, with annual refreshers.

## Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, Joseph Law, to whom all concerns regarding modern slavery should be addressed. He will 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: 19.12.2024**

**Print name:** Craig Gibbons

**Job Title:** COO

**Date:** 19.12.2024