

### **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

## **CITY BUILDING (GLASGOW) LLP**

Modern Slavery is a crime and a gross violation of fundamental human rights. It takes various forms, 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.

We have a zero tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our corporate activities. 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 all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

This statement sets out City Building (Glasgow) LLP's actions to understand all potential modern slavery risks related to business and to ensure steps are maintained to prevent slavery and human trafficking.

#### **Our Business**

City Building is a highly successful and evolving business which has a proven track record of strategic delivery within the commercial marketplace. The principal activities of City Building (Glasgow) LLP are repairs and maintenance, construction, manufacturing and training of apprentices.

The LLP has recently been recognised as one of the top 90 businesses in Scotland for employment and diversity and with a turnover circa £140 million in 2018, our business is in the top 100 construction companies in the UK.

Our achievements over the years, particularly in the areas of sustainability and employment, culminated in the prestigious Queens Award for Enterprise: Sustainable Development in 2018. The LLP is the only Scottish company to receive such an accolade and for the second time in the last 10 years. In addition we have achieved quality environmental and health and safety accreditations ISO 9001, ISO 14001 and OHSAS 18001 and Investors in Young People Gold Awards as well as EFQM Recognised for Excellence 4 Star Award.

We employ more than 2000 people and support an estimated additional 2,000 people through our supply chain. The LLP is currently training 250 apprentices across all construction trades making us the largest employer of apprentices in Scotland.

Our award winning training academy is the most successful apprentice training centre in Scotland. The scale and flexibility of our multi-disciplinary workforce and broad experience allows us to deliver complex projects of all scope and size across a wide variety of built forms.

## Our Supply Chains and Supplier adherence to our values

The relationship with many of our suppliers has been established over a number of years and is built upon mutually beneficial factors. Our supply chain includes providers of goods and services to the construction industry for repairs and maintenance, construction design and manufacturing. We have zero tolerance to slavery and human

trafficking and expect all those in our supply chain and contractors comply with our values.

As and when we have new contractors or suppliers we pre-qualify them through a series of diligence, relating to company performance, health and safety compliance and references from other customers to establish that they are suitable. We have mandatory qualifying questions and includes a commitment to supporting our ethos on zero tolerance of modern slavery. Our commitment is also reflected in our commercial agreements where we bind our suppliers and contractors to adhere to the terms of the Modern Slavery Act.

To date, we have not been made aware of any human trafficking/slavery activities within our business or the supply chain but if any were highlighted to us then we would act immediately in accordance with our legal and moral obligations.

## **Our Policies on Slavery and Human Trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery and Human Trafficking Policy and our related policies for Whistleblowing and Code of Conduct, reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### **Due Diligence Processes for Slavery and Human Trafficking**

As part of our initiative to identify and mitigate risk we have in place systems to:-

- Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains as part of our public procurement obligations.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

# **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide briefings and awareness to relevant members of staff which is sponsored by our Executive Management Team members, who have also been fully trained on the subject. This statement is also published on our website and our employee intranet.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Modern Slavery and Human Trafficking Statement.

Approved by Glasgow City Council and Wheatley Housing Group Limited, the Members of City Building (Glasgow) LLP, on 25th September 2019.