

# **MODERN SLAVERY ACT 2015**

## **NG BAILEY STATEMENT**

## INTRODUCTION

NG Bailey Group Limited is fully committed to compliance with the Modern Slavery Act 2015 (“Act”) in all its divisions, not only in its own dealings but in those of its supply chain.

We have taken several steps to combat slavery and human trafficking and will continue to work to ensure this does not occur in our business or supply chain.

This statement has been published in accordance with the Act and sets out the steps we have taken to prevent slavery and human trafficking in our business and supply chains.

This statement has been approved by our Directors.



DAVID HURCOMB  
CEO

## Organisation's structure and business

The NG Bailey group of companies is made up of the following trading companies:

NG Bailey Group Limited – parent company  
NG Bailey Limited  
NG Bailey IT Services Limited  
NG Bailey Facilities Services Limited  
Kedington (NI) Limited  
Bailey Leasing Limited

Our head office is at Denton Hall, Denton, Ilkley, West Yorkshire LS29 0HH.

We are the UK's leading independent engineering, IT and facilities services business operating in the UK and Europe. We design, build, operate and maintain building infrastructure and IT services.

We are a national business with a local presence and 16 offices across the UK. We also operate internationally with occasional projects and teams operating overseas.

We employ circa 3,000 people within the Group, with an annual turnover in excess of £500m. Our people form the backbone of our business and we continue to invest significantly in training.

## Our supply chains

Our supply chains include a mix of large multi-national organisations, SME's and sole-traders delivering a diverse range of products, systems, services and trades. The vast majority of our trading arrangements are focused within the UK with specific contracts and individual client needs requiring us to procure goods and/or services from within the EU on an ad-hoc basis. All our contracted suppliers of goods and services are obliged, through our MySupplyChain pre-qualification system, to mirror our approach to slavery and human trafficking.

In order to ensure we have a clearer view of our supply chain, a rationalisation programme has been undertaken over the past 12 months – this has reduced our 'live' suppliers to circa 2,500 across our Group. Furthermore, our strategy of working closer with a smaller number of key strategic suppliers affords us the opportunity to embed ourselves within our mutual businesses and develop a much clearer view of the entire supply chain.

On an annual basis our supply chain is risk assessed in order to ensure we are measuring against ever changing market conditions.

## Our policies on slavery and human trafficking

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking Policy 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.

A copy of the NG Bailey Anti-Slavery and Human Trafficking Policy is available on our website and accessible via this [link](#).

To re-inforce our commitment to this issue we also make available to all stakeholders via our website, our Code of Integrity for Business Partners, our Responsible Procurement Charter and our Whistleblowing Policy, each of which sets out our expectations of our supply chain and reinforces our commitment to responsible procurement.

## Due diligence processes for slavery and human trafficking

We have a zero tolerance attitude to slavery and human trafficking and as such have assessed the risk to our organisation as part of our development of this statement.

As part of our initiative to identify and mitigate risk we have taken the following steps:

- We have rolled out a series of communications via email, our intranet and also via a poster campaign across our business to educate all employees on the topic of modern slavery. These communications were designed to highlight the signs of slavery and human trafficking to enable our people to report their concerns via our whistleblowing helpline. To ensure a high level of understanding of the risks of slavery and human trafficking in our supply chains and our business, we have devised and are rolling out training to our procurement teams and other key staff to ensure they have a clear understanding of both our obligations under the Act and the tell-tale signs to look for within our supply chains. Slavery and human trafficking awareness has now also been integrated into our corporate induction which is provided to new joiners of the business.
- Our UK recruitment policy states that all applicants must be asked to provide at interview original copies of their proof of the Right to Work in the UK, in accordance with the amendment to the Immigration, Asylum, and Nationality Act 2006. It is the recruiting manager's responsibility to check each applicant can provide proof of the Right to Work in the UK and subsequently verify the documents. Furthermore, when new employees join NG Bailey, pre-employment checks are conducted. These include ensuring that the bank account details provided for the payment of salary match the name of the employee. Where discrepancies arise we will discuss with the employee and escalate further where necessary. We do not make any cash payments to any of our employees. We also request a National Insurance number which forms part of an individual's evidence of the Right to Work in the UK.
- Where we utilise the services of temporary labour resource within our business, we seek to ensure compliance with the Act through the imposition of a number of contractual obligations on our third party agencies. To support the contractual position we also seek regular data from providers to demonstrate compliance.
- To ensure all those in our supply chain and contractors comply with our Anti-Slavery and Human Trafficking Policy we have in place a rigorous supply chain compliance programme. This consists of a robust prequalification system called MySupplyChain, this requires all our new suppliers to explicitly detail, reference and support with evidence, their approach to tackling slavery and human trafficking. For existing suppliers this disclosure process is ongoing. Any supplier that does not complete the required questionnaire or provides an inconsistent response will be referred to a senior member of our procurement team for investigation. Our standard payment procedures dictate that we do not make cash payments to our material and labour suppliers.
- Our standard trading terms, commercial agreements and subcontract conditions contain a provision that places an obligation upon our supply chain to mirror our slavery and human trafficking commitments and to ensure their compliance with the Act.

## Our effectiveness in combatting slavery and human trafficking

We will use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Target training to 100% of our procurement professionals;
- Provide relevant updates to our employees on the continued risk of slavery and human trafficking to our business to ensure awareness is maintained;
- Continue to map our spend profile to the Global Slavery Index on an annual basis in order to develop a 'Heat Map'. Any spend falling within the high-risk regions, either directly or indirectly will be subject to a higher degree of scrutiny.

## Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Monitoring our performance against the KPI's listed above and communicating to the business where performance needs to be strengthened;
- Where satisfactory controls do not currently exist, collaborate with our supply chain to develop an agreed approach to modern slavery and human trafficking;
- Consider and determine an audit methodology to ensure compliance within our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 24<sup>th</sup> February 2017.

David Hurcomb  
Chief Executive



NG Bailey Group Limited

August 2017