
PORTAKABIN LIMITED MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2023

The Portakabin logo consists of the word "Portakabin" in a white, sans-serif font, set against a solid red rectangular background.

1. INTRODUCTION

Consistent with our commitment to operate ethically and in compliance with all relevant laws and regulations, we recognise our responsibility to manage and prevent the risks of Modern Slavery and Human Trafficking within our operations and supply chain.

This statement describes the positive steps we have taken, will take, and are continuing to take to ensure that Modern Slavery and Human Trafficking does not take place within our supply chain or any part of our business.

2. WHAT WE DO

ORGANISATION STRUCTURE

Portakabin Limited (Company Number: 00685303) ("Portakabin") is the parent company of a number of subsidiaries, including, but not limited to Darwin Group Limited ("Portakabin").

Portakabin has its head office in the UK, with over 2,000 employees operating in ten countries, through its subsidiaries and branches (England, Wales, Scotland, Ireland, Northern Ireland, France, Belgium, Luxembourg, Netherlands and Germany). Further details about Portakabin can be found at www.portakabin.com.

OUR BUSINESS

Portakabin is a market leader in the design, manufacture and installation of permanent and temporary modular and portable buildings, and a pioneer of advanced modular construction across many sectors, including education, retail and leisure, healthcare and construction. Portakabin has its international head office in York and operates its business from a network of hire centres and depots across Europe.

OUR SUPPLY CHAIN

We have a substantial number of suppliers supporting our business operations, covering all aspects of manufacturing, site services, corporate services and subcontracted fit out and installation of our modular buildings. Portakabin operates a global sourcing strategy for components and raw materials, however most of our suppliers are based in the United Kingdom and Western Europe.

We clearly communicate the expectations and requirements Portakabin has in relation to Modern Slavery and Human Trafficking through the supply chain, as further explained below.

OUR PEOPLE

We have reviewed our employment practices across the business, and we have not identified any working practices which would raise concerns that our employees are:

- Forced to work through mental or physical threat;
- Owned or controlled through mental or physical abuse or threat of abuse;
- De-humanised, treated as a commodity or bought and sold as property; or
- Physically constrained or whose freedom of movement is restricted (e.g., through the retention of passports).

3. OUR POLICIES AND GOVERNANCE

POLICIES

In addition to this statement, we have a Modern Slavery and Human Trafficking policy which outlines our stance and commitment to ensuring that there is no Modern Slavery or Human Trafficking in our supply chains or in any part of our business.

Our Employee Code of Conduct (and our existing company policies referenced within it) summarises the principles we rely on to carry out our day-to-day activities and our Supplier Code of Conduct sets out the ethical requirements of our suppliers, including in respect of Modern Slavery and Human Trafficking.

GOVERNANCE AND AUDIT

We have a clear governance process for dealing with any Modern Slavery and Human Trafficking challenges in our operations and supply chains.

Assessing and implementing our controls and actions in respect of Modern Slavery and Human Trafficking will be undertaken by our Legal and Governance function working in conjunction with procurement, HR, project delivery teams across the business and our Internal Risk and Audit team.

Reports on compliance are made to the directors of Portakabin.

4. ASSESSING, MANAGING AND MITIGATING RISK 2023

Set out below is a summary of the actions we take, and specifically have taken in 2023, to mitigate and eliminate the risk of Modern Slavery or Human Trafficking within supply chains:

ASSESSING RISK OF MODERN SLAVERY

In 2023, our Legal and Governance team carried out an assessment of the risk of modern slavery in the business with reference to risk events, risk causes and triggers and current controls and mitigation activities.

We expanded our assessment of key suppliers in our supply chain (i.e. those most significant in terms of volumes, criticality and expenditure across design, manufacturing and delivery) to cover a larger number of suppliers according to:

- a) Supplier Modern Slavery Prevalence Score (Global Slavery Index);
- b) Modern Slavery Vulnerability score (Global Slavery Index);
- c) Modern Slavery Government Response score (Global Slavery Index); and
- d) Industry (“high risk” industries identified in the “Tracking Modern Slavery in Government Supply Chains Guide”).

This risk assessment highlighted that all suppliers assessed, with the exception of one, have low risk modern slavery scores (not including the score relating to the industry in which the suppliers operate). The one key supplier identified with a high Modern Slavery Vulnerability score will be subject to further due diligence to be undertaken in 2024. Those suppliers identified as operating in high risk industries will also be subject to further due diligence in 2024.

We also conducted a supply chain map setting out details of sub-contractors that are used on Department for Education projects and in the creation of which we asked the following questions of suppliers:

- (a) Do you have a Modern Slavery Policy in place?
- (b) Are your workers aware of the Policy?
- (c) Is your company supply chain aware of the Policy?
- (d) Are you company staff trained on the Policy?
- (e) Is the Policy included as a condition in supply chain contracts?

From this, our Procurement team created a summary of the supply chain map and risk mitigation measures

at each tier of the supply chain. In 2024, we will follow-up with suppliers where the answers to the questions highlighted gaps in the measures they are taking to tackle Modern Slavery and Human Trafficking.

The Legal and Governance and Procurement Teams annually complete the Modern Slavery Assessment Tool as further detailed below to assess risk and identify improvement actions.

EMPLOYEE ADHERENCE TO OUR VALUES

Our Employee Code of Conduct (which specifically refers to some practical “Dos and Don’ts” in relation to Modern Slavery with a link to our Modern Slavery and Human Trafficking policy) continues to be an integral element of new employee onboarding and is published on our Intranet for ease of reference for existing employees.

A Modern Slavery awareness briefing and poster for project sites is part of our “Site Operations Manual”. The briefing and poster set out red flags to be aware of as signs of Modern Slavery and Human Trafficking, as well as providing details of what to do if anyone on site (including both employees and third party contractors or visitors) considers that someone may be a victim of modern slavery; they can call the 24/7 modern slavery & exploitation helpline or contact the Portakabin “Speaking Up” service.

SUPPLIER DUE DILIGENCE AND ADHERENCE TO OUR VALUES

The selection and onboarding of suppliers is undertaken centrally or at local level as appropriate. Before any Portakabin supplier is appointed, a comprehensive review is undertaken of their commercial, financial and reputational standing. We also ask suppliers to adhere to our Supplier Code of Conduct as part of the onboarding process.

Our Supplier Code of Conduct specifically requires our suppliers to comply with our policies and workers’ fundamental rights, ensuring that their workers are:

- Free to form or join a workers’ council;
- Paid in compliance with local laws;
- Not required to work more than the maximum hours of daily labour; and
- Not subject to any form of forced, involuntary or debt bonded labour.

CONTRACTUAL CONTROLS

In 2023, we further implemented new supplier terms and conditions referencing compliance with the Modern Slavery Act, which contractually obliges our suppliers to ensure Modern Slavery and Human Trafficking is not occurring in their business or supply chain in accordance with the Supplier Code of Conduct.

OTHER CONTROLS

- Members of the board of directors of Portakabin and other members of senior management make regular visits to our operational sites.
- We conduct regular employee surveys which include seeking employee views on welfare matters.
- We have grievance and speaking-up procedures, including a confidential, independent speaking-up hotline available to all employees. Several of our company policies have been updated to include a QR code which links to our speaking-up procedures. We have not received any reports in 2023 which would raise concern of Modern Slavery or Human Trafficking in our business.
- Our HR teams are alert to flags which could signal risks relating to modern slavery and understand how they should report any issues. We have consulted our HR teams and Business Unit management in the preparation of this statement to confirm that there have been no

incidents of modern slavery or human trafficking arising within the business.

5. TRAINING AND AWARENESS

We have sought to ensure that training and awareness on ethical principles remains at the heart of both our employee “onboarding” experience and ongoing, day-to-day learning and development activities.

All new colleagues are required to read and sign our Employee Code of Conduct, which sets out the company’s zero-tolerance stance to Modern Slavery and Human Trafficking.

Our specific policy on Modern Slavery and Human Trafficking emphasises this stance further.

During 2023:

- The “Toolbox talks” regarding Modern Slavery and Human Trafficking continued to be delivered at project sites across the UK. An awareness poster and briefing note is part of the HSE Site Operations Manual for every project site and materials are printed and displayed in welfare units and any other suitable locations around sites containing details of Modern Slavery and Human Trafficking with a QR code to the Portakabin speaking-up hotline to enable the easy reporting of any incidents identified.
- The intranet makes available the Modern Slavery and Human Trafficking and policy and the “Speaking Up” service.
- The Controls Self-Assessment questionnaire was updated to include questions concerning the awareness of working practices which would raise concerns that Modern Slavery or Human Trafficking is taking place in a business unit or supply chain and the controls are in place to ensure that this does not take place.
- An action plan was created that sets out the steps that the business will take should evidence of modern slavery occur in the business or in its supply chain.
- Modern Slavery and Human Trafficking formed part of Framework Contract training delivered to the England and Wales hire teams by the Legal and Governance team.
- Modern Slavery and Human Trafficking questions were added to site audits to be carried out internally and by a third party provider to commence from 1 January 2024, requesting confirmation that Modern Slavery and Human Trafficking materials are displayed and whether there any concerns around the ethical treatment of contractors or subcontractor on site.

6. OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

Annually, Portakabin carries out the Government’s Modern Slavery Assessment Tool (MSAT) questionnaire.

The MSAT is a modern slavery risk identification and management tool designed to help organisations work in partnership with suppliers to improve protections and reduce the risk of exploitation of workers in their supply chains.

The MSAT has assisted us in ascertaining where we could further improve our approach to ensure that Modern Slavery and Human Trafficking does not take place within our supply chain or any part of our business.

In addition, the Audit Committee receives and assesses assurances that appropriate actions are being taken in respect of combating Modern Slavery and Human Trafficking.

7. PLANS FOR 2024 AND BEYOND

Following a review of the effectiveness of the steps we have taken we intend to take the following further steps to combat the risks of Modern Slavery and Human Trafficking:

- Monitor the answers to audits of project sites confirming that the appropriate materials are displayed and that there is no evidence of Modern Slavery or Human Trafficking.
- Review supplier risk assessments carried out in 2022 and 2023 to identify suppliers that are at a higher risk of modern slavery or human trafficking and undertaken further due diligence on these suppliers. As recommended by the Modern Slavery Assessment Tool, implement training on relevant modern slavery policies to suppliers identified as higher risk.
- Draft and implement a procurement policy setting out our purchasing practices to ensure that undue pressure is not put on suppliers leading to modern slavery as recommended by the Modern Slavery Assessment Tool.
- Continue to ensure that all key non-UK suppliers sign the Supplier Code of Conduct, maintaining a record of all suppliers who have signed.
- Continue to develop an end-to-end Ethical Compliance Framework that includes Modern Slavery and Human Trafficking training and awareness initiatives.
- Review and update the MSAT questionnaire to record improvements made and actions that have been taken following the assessment.
- Monitor specific KPIs and targets in order to measure our progress in tackling Modern Slavery both within our business and our supply chain, such as the number of suppliers who have signed the Supplier Code of Conduct and the number of suppliers risk assessed.
- Increase our co-operation and interaction with other companies in the private sector to understand the initiatives they are taking in tackling modern slavery and government departments and agencies, such as “Unseen” and the “Gangmasters and Labour Abuse Authority”.
- Increase the number of suppliers engaged on our standard terms and conditions of purchase and form of subcontract.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery and Human Trafficking statement for the financial year ending 31 December 2023.

This statement was approved by the board on 27 June 2024.

Dan Ibbetson
Chief Executive Officer
Portakabin Limited