MODERN SLAVERY STATEMENT

This statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024.

Comex 2000 (UK) Ltd has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all our business dealings and relationships. We are also dedicated to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within our business or supply chains, consistent with our obligations under the Modern Slavery Act 2015.

This statement sets out our actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own company or our supply chains.

There have been no reports made of modern slavery concerns across any business operation within the reported year.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

The Company is a provider of network and communication services throughout the UK. It is privately owned employing around 1,169 people with a head office in Derby. The Company's supply chain is primarily based in the UK and supplies aggregates, components and telecom cables. In addition, the Company makes use of around 50 bona fide subcontractors from labour only to fully serviced labour, plant and equipment providers responsible for service delivery.

A number of our clients supply materials to us directly on a free-issue basis which they are responsible for sourcing via their own supply chain partners.

COUNTRIES OF OPERATION AND SUPPLY

The Company currently operates in the United Kingdom.

The Company has assessed where the risk areas of slavery and human trafficking could be in relation to countries of origin of materials or through our activities.

As we are operating exclusively in the UK with the majority of our suppliers also based in the UK, we consider the overall risk of slavery and/or human trafficking through the materials we procure to be low. Within the subcontractors we use to provide labour we have implemented processes to check the policies and practices of those companies before they commence any work with the Company.

For all employees, we carry out Right to Work in the UK checks and pay minimum wages or above in accordance with published UK government legal guidelines in respect of the Minimum Wage.

POLICIES AND CONTRACTUAL PROVISIONS

The approach of Comex 2000 to the promotion of modern slavery issues is contained within our company policies which include but are not limited to:

- Modern slavery Statement
- Anti-Bribery Policy
- Equal Opportunities Policy
- Dignity at Work Policy
- Recruitment and Probation Policy
- Whistleblowing Policy

Our policies apply to all individuals employed or engaged by Comex 2000.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains. If employees believe or suspect a breach or conflict has occurred or may occur, they must notify a member of the Executive Management Team and HR immediately via telephone or people@comex2000uk.com.

The Company has taken steps to ensure that agreements with suppliers include an express obligation for suppliers to comply with the Modern Slavery Act 2015, to implement due diligence procedures within its own supply chains and notify Comex 2000 in the event of any actual or potential incidence of modern slavery.

In the event of a breach of those provisions, the Company will seek to resolve any issues with its suppliers and it may also seek to terminate the relationship with the supplier where a resolution is not achieved.

This provision is regularly reviewed and relevant amendments made.

ASSESSING AND MANAGING RISKS

The Company Modern Slavery risk assessment ensure it continues to address all the key risks of the business.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. The Company is committed to ensuring no-one suffers any detrimental treatment or victimisation because of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

The Board of Directors has overall responsibility for ensuring that the Company meets both its legal and ethical obligations.

The HR Department, along with other support service functions, will monitor the use and effectiveness of any policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery and carry out necessary internal audits. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with the Company's policies.

DUE DILIGENCE

Comex 2000 have identified the main areas of potential risk and exposure to modern slavery that are detailed below with steps we've taken to mitigate the risk:

- Subcontractors – we have set minimum standards to ensure subcontractors implement policies around the avoidance of any sort of modern slavery within their operations. We will be reviewing the compliance against these standards through targeted audits.
- Waste Management – as this has been identified as a potential risk the company continue to procure waste contractors through a centralised broker who independently audits waste facilities across a range of environmental and social issues on our behalf.

In addition, the company employees a team of Compliance Assessors who independently audit a sample of worksites each month. The Compliance team have been coached to identify signs of modern slavery and should they identify any areas of concern during their visits these would be flagged to the Head of Compliance.

PERFORMANCE INDICATORS

The Comex 2000 Board appreciates that the approach to combatting modern slavery will continually evolve following annual risk reviews. In the reporting period the following performance metrics have been monitored:

- 565 employees have provided evidence they have received a toolbox talk briefing on modern slavery

- 773 new starters have received Modern Slavery awareness during induction
- 18 new subcontractors onboarded with modern slavery policies

This statement has been approved on behalf of the Comex 2000 Board on 31st March 2024.



Mark Philby, Managing Director