Anti-Slavery and Human Trafficking Policy Statement Financial Year 2023-2024

1. POLICY STATEMENT

The Modern Slavery Act of 2015 requires certain businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains.

Designer M & E Services UK Limited 'Designer Group' has a zero-tolerance approach to modern slavery and acts ethically and with integrity in all its business dealings and relationships. The company is fully committed to playing its part in eradicating modern slavery and to maintaining and improving its systems and procedures to ensure that there is no complicity in human rights violations in its operations and those of its supply chain.

Designer M & E Services UK Limited recognises that slavery and human trafficking can occur in many forms. Therefore, throughout this statement the terms "slavery and human trafficking" are intended to encompass all forms of coerced labour.

This statement refers to the financial year ending 31st March 2024. It sets out the steps taken by Designer Group to prevent modern slavery and human trafficking in its own operations and its supply chains.

2. COMPANY ORGANISATION AND STRUCTURE

The company is an industry leader in building services and provides a complete range of services including design, installation and maintenance to all sectors of industry and commerce. It is the largest of five companies comprising Designer Group Engineering Contractors Holdings DAC, which has its headquarters in Dublin, Ireland.

Designer Group M & E Services UK Limited has an annual turnover in excess of £36 million. Its operations fall within the United Kingdom, the European Union and the European Economic Area (EEA).

3. OUR SUPPLY CHAIN

Our supply chains provide materials and sub-contract labour for the company's various projects. The company takes all possible steps to verify, evaluate and address risks of slavery and human trafficking in our supply chains. Responsibility for ensuring that this happens is held at Director level by the Board of Directors.

4. POLICIES ON RELATION TO SLAVERY AND HUMAN TRAFFICKING

Designer Group operates a number of policies that reflect our objective to act ethically and in line with our legal and regulatory obligations with regard to our employees, customers and business relationships.

Designer Group encourages anyone, including its employees, sub-contractors, suppliers, and clients, to report in good faith any issues or concerns about potential ethical, human rights, legal or regulatory violations including modern slavery and human trafficking.

This approach is explicit in the company's policies and procedures on Anti-Bullying and Harassment, Anti-Fraud, Bribery and Corruption, Equality and Diversity and in the company's, Whistle Blowing policy and procedure. These policies and procedures are issued to all our employees as well as our contractors and compliance is a condition of employment with the company.

5. DUE DILIGENCE PROCESS

In conducting appropriate due diligence, Designer Group assesses its suppliers across a number of key risk areas. There is an ongoing commitment to engage only those suppliers that uphold the same principles as Designer Group.

The company's verification process involves an assessment of our suppliers, who are required to complete a self-assessment questionnaire, including questions targeted at slavery and human trafficking risk.

Designer Group uses this questionnaire to determine the risk profile of suppliers with regard to environmental factors, ethical trading and sustainable procurement, health and safety, quality, bribery and corruption, equality and diversity, modern slavery and human trafficking. The company engages in regular audits as part of the overall supply chain management process.

Wherever possible Designer Group employs its staff direct on permanent contracts, with direct terms and conditions that are considerably in excess of statutory minima.

6. RISK ASSESSMENT AND MANAGMENT

As Designer Group is not in an industry with a high risk of modern-day slavery, a risk-based approach has been adopted to review supply chains, we have worked to identify actual or potential risk of modern slavery.

Starting with our own business operations and service providers, in the United Kingdom, European Union and EEA together with our supply chains, we have worked to identify actual or potential risk of modern slavery.

We review all our service providers annually to identify those with the highest potential risks of modern slavery. This is based on an evolving risk in the sector, their contract type, the level of skill involved in the work, wages and our visibility of the service provider.

7. MEASURING EFFECTIVENESS

We review the employment status and conditions of employment of all employees both in our own business operations and with providers of agency staff and temporary workers. This happens without exception upon supply or recruitment and regularly on at least an annual basis thereafter.

8. TRAINING

In order to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, as well as other legal requirements we provide training to our employees covering all legal provisions and requirements with which the business must comply. During the year we have further built on the training we offer within the business to include mandatory e-training modules on legal and regulatory compliance, including modern slavery and human trafficking.

Our managers also received further support that includes training and line management guidance to ensure consistency of our recruitment processes, management of suppliers, fair treatment at work, and inclusion and diversity.

9. BOARD OF DIRECTORS APPROVAL

Responsibility for ensuring that the Group has appropriate policies in place to meet our obligations under the Modern Slavery Act rests with the Board of Directors.

This statement has been produced by the Senior People Manager and Approved by the Board of Directors on 22 July 2024. It will be reviewed annually.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes the company's slavery and human trafficking statement for the current financial year 2022/23

For and on behalf of Designer M & E Services UK Limited
Paul Waugh
UK Managing Director

Date
22.07.2024