

## Modern Slavery Policy

Owned by	Will Smith, Managing Director
Reviewed	March 2025
Version	3
Next Review Date	March 2026

### Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Smith and Byford Limited, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2022.

### Our business and supply chains

Smith and Byford Limited was founded in 1966 and provide a wide range of installed building system support services to social housing providers, corporate clients, private landlords, property management agents, and residential customer in predominantly the London and Southeast England area. We have a workforce of around 400, about half of which are mobile teams under the supervision of contract or area managers.

Smith and Byford Limited operate full electrical and gas installation and maintenance services which are provided by our teams of qualified professionals. We also provide building control and monitoring systems via our BMS division.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure of the supplier's reputation, respect for the law, insurances & annual modern slavery statement.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Smith and Byford Limited, St George House, Station Approach, Cheam, Surrey, SM2 7AT  
 Reg. No. 1074356 England, Registered Office St George House, Station Approach, Cheam, Surrey, SM2 7AT  
 Directors: W.Smith, D.Ovington, P.McLachlan, B.Grove, B.Smith, H.Smith, M.Herridge



## Risk assessment

We've conducted annual reviews to determine our response and the risk controls that we implement. This included:

- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- Review of supplier modern slavery statement annually
- Monthly supplier management review meetings

## Policies

Smith and Byford Limited operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- **Whistleblowing Policy** - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline (Employee Assistant Programme) to protect the identity of whistle-blowers, in addition our company whistleblowing policy see company handbook.
- **Code of Conduct** - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- **Onboarding** – We will provide training to onboard new starters, making explicit reference to slavery and human trafficking via training videos.

## Supplier due diligence

Smith and Byford Limited conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services by monitoring unrealistically low pricing
- Auditing of supplier's insurances annually
- Requiring improvements to substandard employment practices
- If evidence of modern slaving or human rights abuses were found within any of our contracted suppliers, we would take immediate action to notify the appropriate authorities and work with the supplier to understand the situation.
- We require suppliers who meet financial criteria to supply annual Slavery Policy updates.
- They adhere to responsible recruitment, fair work and are free from exploitation.  
e.g. Participating in collaborative initiatives - Wolsey are a member of Stronger Together

## Awareness

Smith and Byford Limited has raised awareness of modern slavery issues by putting up posters across our facilities and sending an email that is focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking

- How employees should report suspicions of modern slavery

### **Training**

In addition to the awareness programme, Smith and Byford Limited are an in-house training provider for IHASCO. They provide 100+ courses to develop employee knowledge and skillset. IHASCO provide an online Modern Slavery Training Course. It provides the knowledge on how to report, acknowledge and how to handle modern slavery in and around the workplace. Alongside this, it touches upon the Modern Slavery Act 2015 and is CPD Accredited.

### **Measuring how we're performing**

Smith and Byford Limited has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- How many employees have completed training
- How many suppliers have rolled out an awareness and training programme
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues

### **Review**

This statement covers 31<sup>st</sup> March 2024 to 31<sup>st</sup> March 2025 and has been approved by the board of Smith and Byford Limited. The Board of Directors will review the operation of this policy once a year (or more regularly if we identify any non-compliance or problem preventing slavery and human trafficking in our operation and supply chain).

Signed: Will Smith, Managing Director

Date: 31<sup>st</sup> March 2025

