



WOODFORD

Introduction

This statement sets out Woodford Heating and Energy Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2020 to 31 December 2020.

As part of the construction industry within the UK we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Woodford Heating and Energy Limited:

- Woodford specialise in mechanical and electrical building services within the UK construction industry.

The following is the process by which the company assesses whether or not particular activities are high risk in relation to slavery or human trafficking:

- We seek confirmation from our supply chain that they take relevant appropriate steps to eradicate the risk of slavery or human trafficking.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Procurement of supplies and materials from outside the UK.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** The Managing Director is responsible for putting in place and reviewing policies and the process by which they were developed.
- **Risk assessments:** The Commercial Director has broad organisational responsibility for human rights and modern slavery risk analysis.
- **Investigations/due diligence:** The People Experience department are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking, and will raise concerns to the Managing Director and Commercial Director.



WOODFORD

- **Training:** Every employee and subcontractor that works with Woodford have to undertake modern slavery awareness training on joining and it also forms part of the induction process.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline/complete our confidential disclosure form.
- **Supplier/Procurement code of conduct** We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment policy** We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

We undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the organisation's own staff/third party auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through third party auditor and requiring them to implement action plans;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.



WOODFORD

Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- requiring all staff to have completed training on modern slavery by 31 July 2021;
- developing a system for supply chain verification, whereby we evaluate potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains expected to be completed by 31 December 2021 whereby we evaluate all existing suppliers.

Training

We require all staff to complete training on modern slavery as a module within our wider human rights/ethics/ethical trade training programme.

Our modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Awareness-raising programme

As well as training staff, we have raised awareness of modern slavery issues by distributing flyers to staff/putting up posters across our premises/circulating a series of emails to staff.

The flyers/posters/emails explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

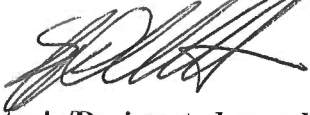
Board Member approval

This statement was approved on 1st June 2021 by our board of directors, who review and update it annually.



WOODFORD

[Director's/Designated member's/Partner's] signature:



[Director's/Designated member's/Partner's] name:

STEVE ABBOTT (MANAGING DIRECTOR)

Date: 10/6/21.