

## Modern Slavery Policy

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## Modern Slavery Policy

### Introduction

Modern Slavery is a hidden crime that affects over 40 million victims globally. The term covers several crimes including Sexual Exploitation, Forced Marriage, Criminal Exploitation, Domestic Servitude and Labour Exploitation. Through the introduction of the Modern Slavery Act 2015 businesses are required to understand the impact they have on the potential for modern slavery and make efforts to address the issue where they can. This includes considering the impact we have on supply chain activity and the potential for exploitation within.

This policy outlines Action Sustainability's commitment to address modern slavery issues, both through our organisational activities and our supply chain commitments.

Ethical business is at the heart of what Action Sustainability believes in and we are committed to acting with integrity in all our business activities and relationships.

We are also committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business and exercising robust due diligence of all our partner organisations and suppliers.

### About Action Sustainability

Action Sustainability is a specialist consultancy based in London. Its' focus is sustainable business and supply chains. Our UK annual turnover is currently £4.4million and we have 61 employees with additional support being provided from a team of associates.

We have a robust and fair recruitment process, utilising specialist recruitment services as well as ensuring that we advertise roles in an open and fair way from the widest talent pool available. As part of our recruitment process, we conduct phone interviews, followed by face-to-face interviews and ensure that we check references and legal status before offering employment.

As well as providing training and consultancy services for several sustainability themes including, Sustainable Procurement, Social Value, Carbon, Modern Slavery amongst others, Action Sustainability is the delivery partner for the award-winning Supply Chain Sustainability School.

This organisation has been designed to upskill the supply chain in the construction industry as well as providing opportunities for construction partners, up and down the value chain, to work collaboratively in order to address key sustainability challenges within the industry.

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### Our people

We recognise that people are our best asset and as a result we endeavour to look after them and reward them accordingly.

In terms of the UK operations, we are an accredited Living Wage employer and pay over the living wage and therefore by default the minimum wage. We do not operate any zero hours contracts but utilise associates as part of the wider Action Sustainability team.

All employees within Action Sustainability benefit from a scheme designed to support their physical and mental wellbeing and can part take in flexible working conditions including part time and remote working. In addition to this they benefit from an above industry average pension contribution scheme designed to support their future prosperity.

Our staff have been trained on Modern Slavery amongst a range of other labour issues including Fairness Inclusion and Respect.

### Our supply chain

Action Sustainability self-deliver most of its work and does not have significant supply chain spend. Where we arrange face to face events, we run them in line with ISO20121 – Standard for Sustainable Events. We have now moved to a significant element of our delivery to online so our spend is has significantly decreased. For the remaining elements of our spend, where standards exist to support the eradication of exploitation, we endeavour to request these.

### Our business impacts

Whilst our impact on our own supply chain is limited, Action Sustainability's, ability to influence supply chains we work with is extensive. Since the act came into force, we have raised awareness of modern slavery, especially in the construction industry. Through the Supply Chain School specifically, we have encountered over 100 businesses and advised them on how they can establish their own due diligence systems and trained over 2,000 people all over the UK.

We are signatories of the UK GLAA Construction Protocol and have developed numerous materials designed to raise awareness and support businesses in their own journey in combatting modern slavery.

### Our objectives

Although a small organisation Action Sustainability has set objectives for the next 12 months that are designed to formalise further the activities already undertaken both within our operations and our supply chain.

- 1) Refresh the awareness of existing employees and ensure new employees are briefed on the issue of modern slavery and transparency in supply chains

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- 2) Refresh the risk profile of our supply chain spend to identify any additional spend areas that need modern slavery considerations to be included as part of the procurement decision
- 3) Ensure that our events protocol has checks in relation to modern slavery and labour standards requirements
- 4) Assess our due diligence process and evaluate the need for third party accreditation

## Modern Slavery Policy

### Governance

This policy statement applies to all employees within Action Sustainability and its operations in the UK.

It is endorsed by our Directors and will be reviewed and monitored annually.

### Review

Action Sustainability is committed to the process of continual improvement and this procedure will be reviewed every year, or sooner if deemed necessary' with the respective person notified that the policy is out of date.

**Date of approval / revision:** 3<sup>rd</sup> July 2024

Signed:



Shaun McCarthy  
Director

Signed:



Ian Heptonstall  
Director