



## Annual Modern Slavery Statement

### Introduction

Shepley Engineers is committed to the prevention of Modern Slavery and Human Trafficking and will not tolerate or condone any such identified act within any aspect of our business activities.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015, it sets out the activities undertaken by the Company in respect of the prevention of Modern Slavery and Human Trafficking and constitutes the Company's annual statement for the financial period 1<sup>st</sup> October 2018 to 30<sup>th</sup> September 2019.

### Organisational Structure

Shepley Engineers provides a diverse range of specialist construction and engineering services in support of the creation and maintenance of assets for both public and private sector customers in the Energy Sector. Our work is conducted solely in the United Kingdom and delivered by a directly employed workforce all of whom are fully eligible to work within the United Kingdom, and many are regularly subject to various levels of security vetting.

Shepley Engineers recruit either directly or via a limited number of reputable recruitment partners, who are required to successfully complete our supply chain due diligence process, prior to being accepted as a recruitment partner.

Shepley Engineers believe that no worker should pay for a job. The cost of the recruitment of ANY worker engaged by Shepley Engineers will be borne by Shepley Engineers not the worker and, as part of our due diligence and risk identification processes, we will ensure that our supply chain and recruitment partners also adhere to this principle.

### Supply Chain

Given the nature of our organisational structure, model of directly employed work delivery and our use of a UK based Supply Chain, we consider that any exposure to risk of Modern Slavery or Human Trafficking is extremely low and that should any risk exist it is most likely to be within the extended Supply Chain. We work closely with our Tier 1 members of our Supply Chain in the identification of such risk to ensure it is addressed in an appropriate manner.

### Modern Slavery Policy

Shepley Engineers has implemented a comprehensive policy in slavery and human trafficking which is available upon request. This policy and supporting procedures detail our business approach to the prevention of Modern Slavery and Human Trafficking, along with the processes used to support and deliver our commitment. This policy and commitment has been communicated to our Tier 1 Supply Chain partners for their information and action.

We operate a risk based approach to the identification of Slavery and Human Trafficking the principle of which is based on the location of the product or service, industry sector, supplier relationships and existing data held supported by additional information and guidance obtained from, but not limited to, sources such as the Global Slavery Index, Corruption Perceptions Index and US Department of Labour Lists of Goods and Suppliers.



Gold Awards/Medals: 1997 to 2005  
Sector Commendation: 2002  
Presidents Awards: 2006 to 2010  
Order of Distinction: 2011 to 2013, 2015, 2016, 2017, 2018, 2019  
Commends: 2014



## **Due Diligence and Identification of Risk**

Shepley Engineers policy of direct employment is supported by robust processes which ensure that an individual's identity is confirmed and they have a legitimate right to work in the United Kingdom. This policy and the right to work checks undertaken by our staff minimise the risk of employing forced labour or those who may be subject to human trafficking.

Where Shepley Engineers do utilise labour only sub-contractors we have introduced due diligence checks to ensure that, as a minimum, labour providers comply with our commitment to the Prevention of Modern Slavery and their processes for recruitment contain no illegal labour practices.

Notwithstanding that Shepley Engineers Supply Chain is primarily UK based. Part of supplier assessment questionnaires is the request for Statements and Policies on Modern Slavery. This supplier assessment process is now part of normal business.

## **Communication and Training**

Shepley Engineers commitment to the prevention of Modern Slavery and Human Trafficking emanates directly from our Board of Directors. Their leadership and commitment to this important social issue has been clearly communicated both internally to employees and externally to subcontractors and Tier 1 Supply Chain partners.

Whilst all employees have received awareness training in relation to Modern Slavery, employees who have a direct responsibility and involvement for the engagement of workers and for dealing with supply chain matters have received appropriate levels of training in these issues.

We acknowledge that we are in the early stages of a long-term process and our approach to the Prevention of Modern Slavery and Human Trafficking will undoubtedly evolve year on year. We will utilise our annual statements to reaffirm our continued commitment and communicate this evolution including the steps we have taken and will continue to take do deal with this socially important issue.

The Board of Directors have reviewed, accept and fully support this statement and formally approved it on 20 March 2020.



Nick Houghton  
Managing Director  
Shepley Engineers

23<sup>rd</sup> March 2020



Shepley Engineers Ltd

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## Modern Slavery Statement 2019



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Nick Houghton  
Managing Director  
Shepley Engineers

27<sup>th</sup> February 2019



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Notwithstanding that Shepley Engineers Supply Chain is primarily UK based, we have completed a risk assessment of supply chain activities to identify and prioritise any areas which may pose a risk of Modern Slavery. Our activities to date include:

- We have reviewed the risk assessment and written to all suppliers of >£50k who we identified as requiring further confirmation of their understanding of the Modern Slavery Act and have gained confidence of their compliance.

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Nick Houghton  
Managing Director  
Shepley Engineers

19<sup>th</sup> February 2018