



“Rely on us to keep you warm”

Modern Slavery Statement for financial year ending 31 September 2020

Modern Slavery Statement

This report covers our progress against modern slavery actions in six areas:

Our Supply Chain Structures

Our Policies on Modern Slavery

Our Due Diligence Processes

Risk Evaluation and Assessment Procedures

Our KPIs and Measuring Our Effectiveness

Training Completed for our Teams

MODERN SLAVERY

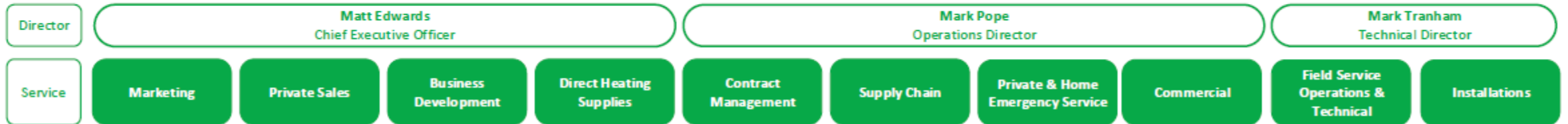


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Swale Heating Ltd. Organisation Structure

External Operations, Sales and Delivery- Matt Edwards, Chief Executive Officer

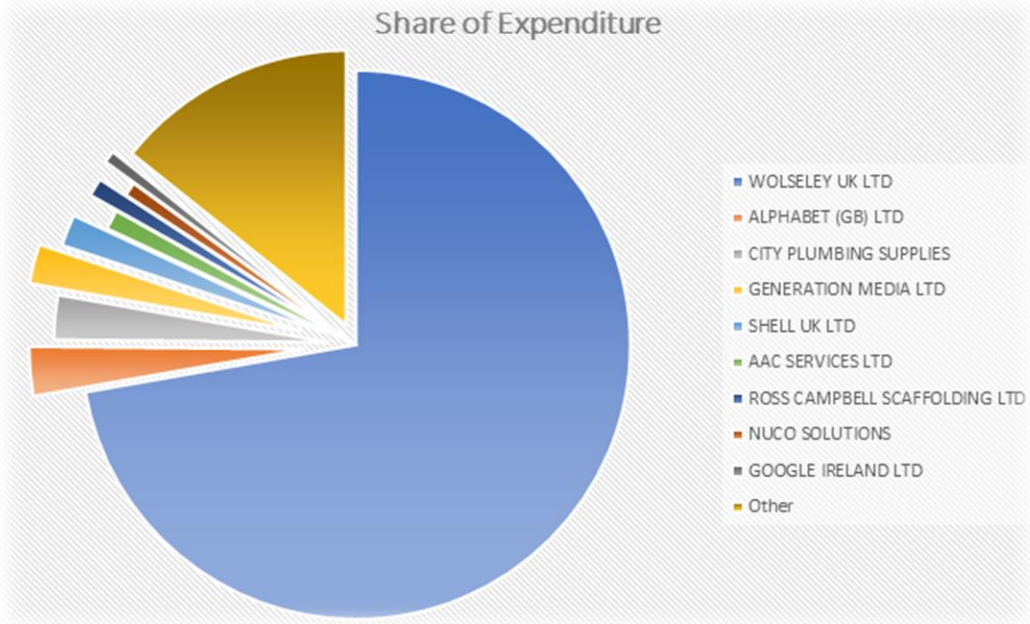


Internal Operations and Control- Andy Ellis, Chief Operating Officer/ Chief Financial Officer

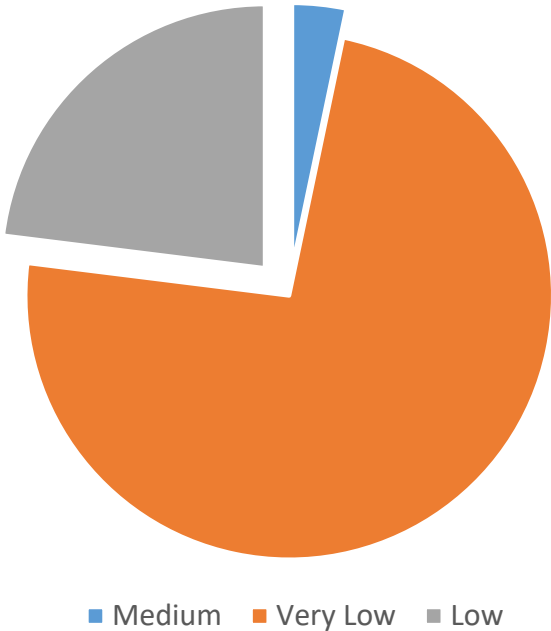


Supply Chain Structure

Supplier Overview by Spend



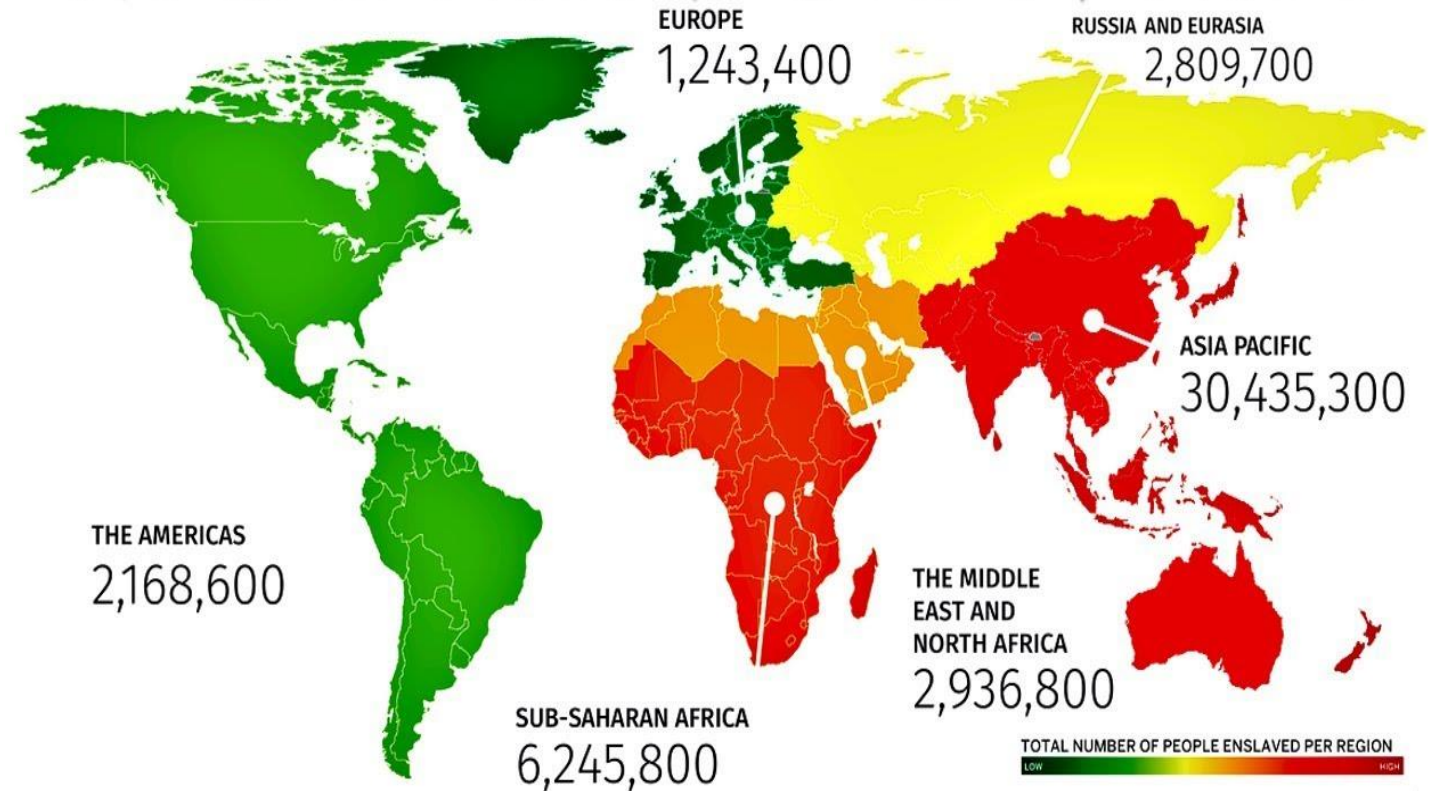
Supplier Risk Categorisation



Due Diligence Processes for Modern Slavery

- We have resilient auditing processes with all our raw material and parts suppliers and evaluate their conformance to the law based on their risk profile.
- As our top supplier, Wolseley UK LTD has regular compliancy checks, despite the internal risk rating of "Low".
- All new suppliers are initially risk assessed, provided a risk rating, and audited regularly depending on the risk.

MODERN SLAVERY



Risk Assessment

Medium Risk Suppliers / Clients

Lower Risk Suppliers / Clients

Organisation Detail	Risk Assessment Date	Reason for Risk Rating
BNS Heating Spares	May 21	New supplier
Clearabee	May 21	New supplier
Heatlink (Technical solutions Ltd.)	May 20	New supplier

Organisation Details	Risk Assessment Date	Reason for Risk Rating
Wolseley UK	September 21	Policy training
BSS Group	September 21	Policy training
Bansal Heating and Plumbing	September 2021	Policy awareness



Our Policies on Modern Slavery

Our Policy on Modern Slavery was updated in 2020 and can be viewed in full at:

https://swaleheatinguk.sharepoint.com/:w:/r/Support%20and%20Control/_layouts/15/Doc.aspx?sourcedoc=%7B91F206A3-9A6E-4DF1-8D2F-1911EE81CD93%7D&file=Anti-slavery%20Code%20of%20Conduct%20-%202020.docx&action=default&mobileredirect=true&cid=bae5d76f-8234-4f44-8d79-63a6ac48ebb5

Our Policy on Whistleblowing was updated in March 2021 and can be viewed in full at:

<https://swaleheatinguk.sharepoint.com/Support%20and%20Control/HR/Shared/Policies%20and%20Procedures/Whistleblowing%20Policy.pdf>



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Tracking our Progress and Effectiveness

Swale Heating has a strategy for monitoring and reporting on instances of modern slavery with our business operations and supply chain. This includes the following:

- Regular review of company strategy
- Policies, procedure, & processes
- Director's responsibility
- 3rd party agreements
- Training and team engagement
- Preventing slavery within Swale Heating
- Preventing slavery within supply chain by robust auditing

Strategy Topic	Progress Measure	Current Actions
Review Company Strategy (2020)	50% Complete	Finalise 2020/21 review and actions
Policies, procedures and processes	100% Complete	
Director's responsibility	80% Complete	Continued revision of responsibilities
3 rd Party Agreements	100% Complete	
Training and Engagement	90% Complete	Wider publication of awareness
Preventing slavery within SHL	90% Complete	Complete process audits
Preventing slavery in our supply chain	60% Complete	Complete process audits



Key Performance Indicators

Swale Heating has three KPIs for measuring the effectiveness of our processes and procedures in eliminating modern slavery:

- 1) 100% Supplier Engagement
- 2) 100% Contractor Compliance
- 3) Modern Slavery awareness training: 100% for new employees and 50% refresher training

These KPIs have been in affect since the beginning of 2021 therefore trends and action points will be reviewed later in the year.



Staff Training and Awareness of Modern Slavery

- All directors, managers and some office based staff have completed foundation training in requirements of the Modern Slavery Act
- Further training is planned for key decision makers regarding their responsibilities in the Act
- Refresher training for all directors and managers is planned for the summer of 2021
- All field staff attended a Modern Slavery toolbox talk in March 2021 to enable them to identify instances of multiple or at risk social housing tenancies. This messaging is periodically put on the agenda to continually keep it at the forefront.

HELP FREE THE UK FROM MODERN SLAVERY

Modern Slavery is the illegal exploitation of people for personal or commercial gain. Victims are trapped in servitude, which they were deceived or coerced into, and cannot leave.

MODERN SLAVERY INCLUDES:

- SEXUAL EXPLOITATION** (represented by male and female symbols)
- CRIMINAL EXPLOITATION** (represented by a gavel)
- FORCED LABOUR** (represented by crossed pickaxe and shovel)
- DOMESTIC SERVITUDE** (represented by a bucket and broom)

Approval by the Board of Directors

Date Approved: 31/03/21

Approved by:



Matthew Edwards: Chief Executive Officer

Approved by:



Andy Ellis: Chief Operating Officer

