



"Rely on us to keep you warm"

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

Measuring Our Effectiveness

Training Completed for our Teams



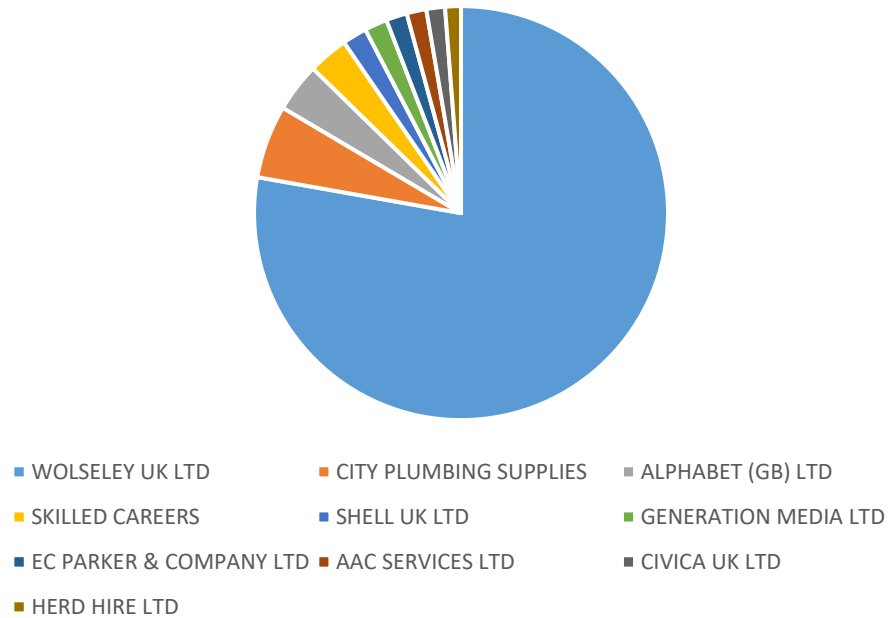
www.swaleheating.com



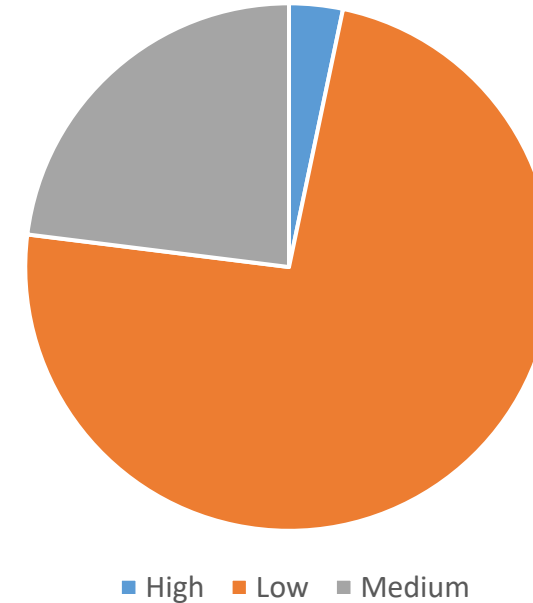
Supply Chain Structure

Supplier Overview by Spend

10 highest Share of Expenditure



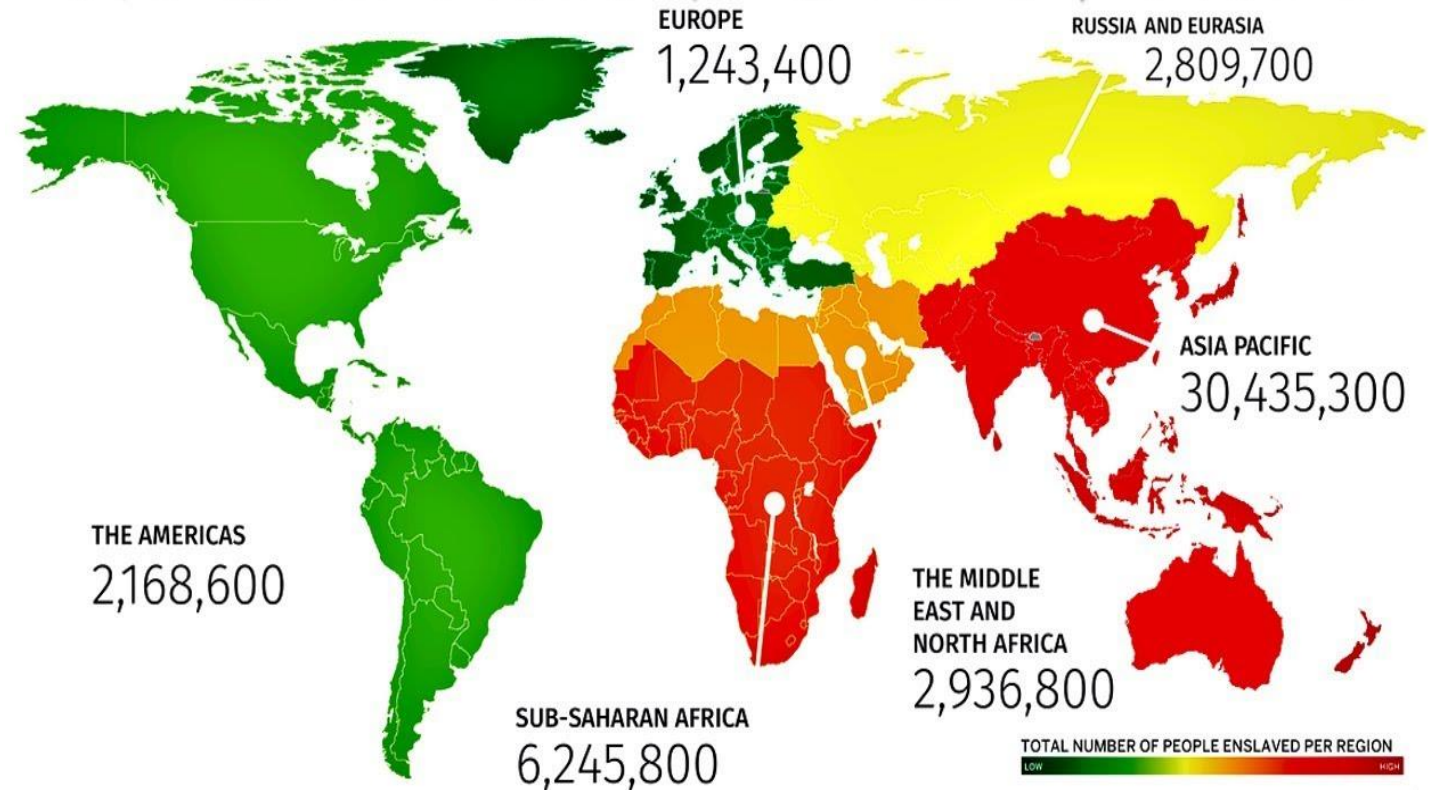
Supplier Risk Categorisation



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 Details	Risk Assessment Date	Reason for Risk Rating
Mcdonald Water Storage	June 2022	New Supplier
TLC Direct	May 2022	New Supplier
Canterbury Boiler Spares LTD	May 2022	New Supplier

Organisation Details	Risk Assessment Date	Reason for Risk Rating
Wolseley UK	September 2022	Policy training
City Plumbing Supplies	September 2022	Policy training
Shell UK LTD	September 2022	Policy awareness



Our Policies on Modern Slavery

Our Policy on Modern Slavery was first published in June 2016 and can be viewed in full at:

<https://swaleheatinguk.sharepoint.com/Support%20and%20Control/HR/Shared/HR%20Modern-Slavery~Policy.pdf>

Our Policy on Whistleblowing was updated in December 2018 and can be viewed in full at:

<https://swaleheatinguk.sharepoint.com/Support%20and%20Control/HR/Shared/HR%20Modern-Slavery Whistleblowing Policy.pdf>



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

Strategy Topic	Progress Measure	Current Actions
Policies, procedures and processes	100% Complete	
Director's responsibility	70% Complete	Complete revision of responsibilities
3 rd Party Agreements	100% Complete	
Training and Engagement	90% Complete	Wider publication of awareness
Preventing slavery within SHL	84% Complete	Complete process audits
Preventing slavery in our supply chain	50% Complete	Complete process audits



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 ongoing for key decision makers regarding their responsibilities in the Act
- Training for field based staff is also ongoing with sessions to be included in the summer training programme 2022
- Procedures for reporting possible cases of slavery encountered in the field have been rolled out – specifically relating to instances of multiple or at risk social housing tenancies

HELP FREE THE UK FROM MODERN SLAVERY

MODERN SLAVERY INCLUDES:

SEXUAL EXPLOITATION

CRIMINAL EXPLOITATION

FORCED LABOUR

DOMESTIC SERVITUDE

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.



Approval by the Board of Directors

Date Approved: 25/10/22

Approved by:



Matthew Edwards: Chief Executive Officer

Approved by:



Andy Ellis: Chief Operating Officer

