

Modern Slavery Statement 2022



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

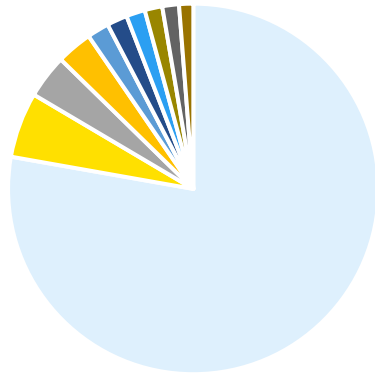
Training Completed for our Teams



Supply Chain Structure

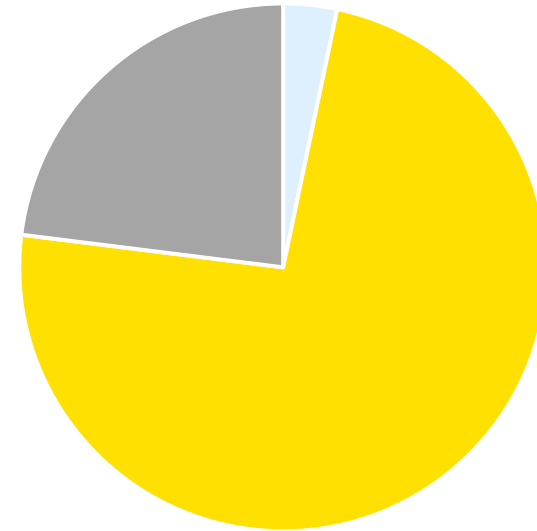
Supplier Overview by Spend

10 highest Share of Expenditure



- WOLSELEY UK LTD
- ALPHABET (GB) LTD
- SHELL UK LTD
- EC PARKER & COMPANY LTD
- CIVICA UK LTD
- CITY PLUMBING SUPPLIES
- SKILLED CAREERS
- GENERATION MEDIA LTD
- AAC SERVICES LTD
- HERD HIRE LTD

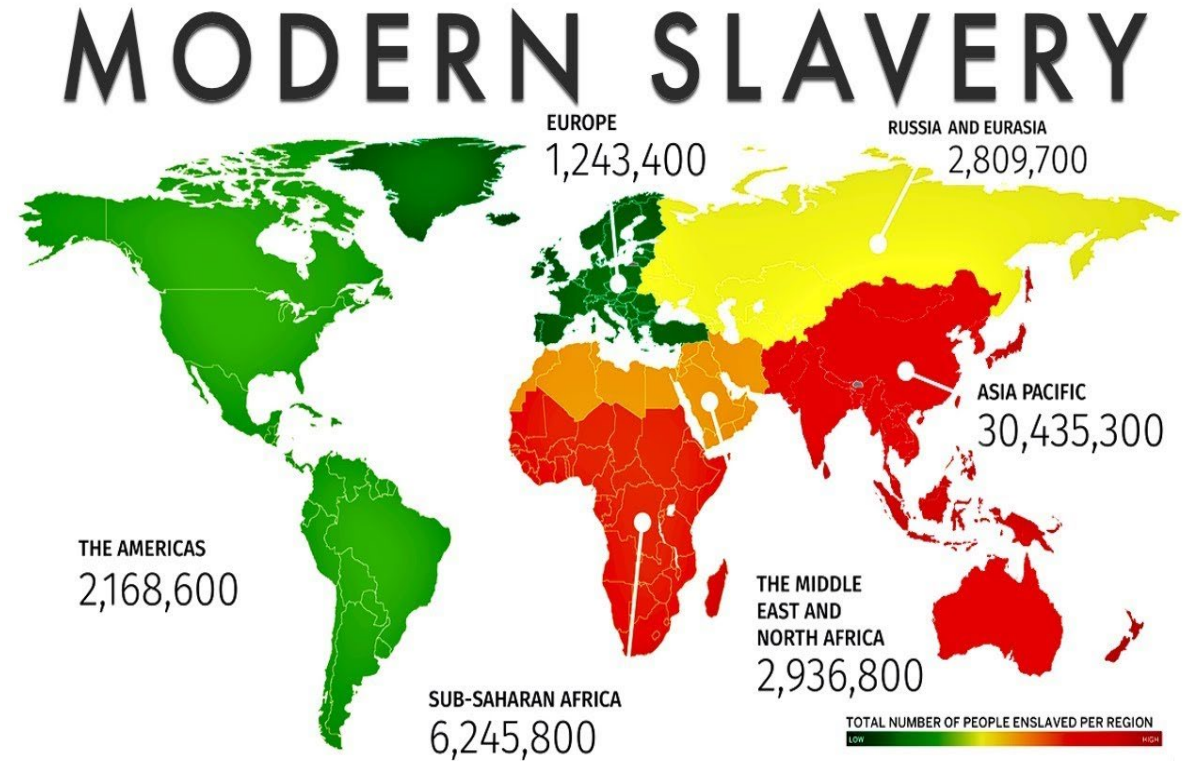
Supplier Risk Categorisation



■ High ■ Low ■ Medium

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.



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](https://swaleheatinguk.sharepoint.com/Support%20and%20Control/HR/Shared/HR%20Modern-Slavery%20Whistleblowing%20Policy.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 |
|--|------------------|---------------------------------------|
| Review Company Strategy (2021) | 25% Complete | Finalise 2020/2022 review and 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 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.

**SEXUAL
EXPLOITATION**



**CRIMINAL
EXPLOITATION**



**FORCED
LABOUR**



**DOMESTIC
SERVITUDE**





Approval by the Board of Directors

Date Approved: 4/05/22

Approved by:

Handwritten signature of Matthew Edwards in blue ink.

Matthew Edwards: Chief Executive Officer

Approved by:

Handwritten signature of Andy Ellis in blue ink.

Andy Ellis: Chief Operating Officer



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