



Warmworks Scotland LLP

Modern Slavery Statement for the financial year ending 31 March 2022

Modern Slavery:

Modern slavery is the illegal exploitation of others. It is a violation of fundamental human rights and can destroy lives. Modern slavery can take many forms, including sexual exploitation, domestic servitude, forced labour and criminal exploitation.

The impacts of modern slavery can affect diverse groups of people, of any age or gender, and its effects can touch almost any industry.

Warmworks is committed to protecting the rights and freedoms of everyone within its organisation and its supply chain. We are aware of the problems that modern slavery brings, and the harm it causes, and will seek to eliminate these to the best of our ability.

Warmworks works with a diverse network of registered sub-contractors and suppliers, and is seeking to put measures in place to ensure that we do not work with any companies that participate in or condone modern slavery.

Who we are:

Warmworks, formed in 2015, is a joint venture partnership between Energy Saving Trust, Changeworks and Everwarm.

Warmworks is committed to tackling fuel poverty, increasing the energy efficiency of the homes and communities in which we work and consistently delivering a first-class service to the households and families that we support.

Since 2015, Warmworks has been the Managing Agent of the Scottish Government's national fuel poverty scheme, Warmer Homes Scotland, and has recently started work on a range of new contracts and initiatives across the UK.

Warmworks has already helped more than 29,000 homes to become warmer, healthier and more energy efficient and is seeking to play a key role in the long-term drive to reduce carbon emissions and increase the availability of affordable, sustainable energy for all.

What we do:

Warmworks manages energy efficiency retrofit schemes across the UK, identifying experienced and qualified experts to survey, design and install a range of measures that will improve the energy efficiency of our customers' homes and help to tackle fuel poverty.

Warmworks' growth and success are built on providing clients with a pool of registered, high-quality third-party sub-contractors. We manage their activities, so as to ensure the quality of the work, as well as sourcing the products and equipment that are needed to deliver on the goals of our clients.

Risk identification:

Warmworks believes that the greatest risks associated with modern slavery and human trafficking in its business are related to the products in its supply chain and third-party sub-contractors.

We are conscious that, whilst Warmworks purchases its products from UK suppliers, these suppliers will often have imported components from overseas. We are equally aware that questions have been raised about the pay and working conditions under which some downstream elements of our supply chain may operate.

With respect to third-party sub-contractors, construction and associated activities are often seen as high-risk areas. Given the large number of surveyors, installers and other sub-contractors with which we work, we are, therefore, aware that this is another potential area of vulnerability that we must actively seek to address.

Our policies and procedures:

Warmworks has a suite of policies that assist it, directly and indirectly, to address the risks associated with modern slavery. These include:

- **Modern Slavery Policy:** this policy sets out how Warmworks assesses the risks associated with its operations, and how it seeks to minimise and mitigate those risks, as well as the conduct, levels of awareness and values that employees should have
- **Whistleblowing Policy:** this provides employees with a framework for reporting any wrongdoing or behaviour inconsistent with Warmworks' policies and values
- **Disciplinary Policy;** and **Grievance Policy:** these policies set out how employees can raise concerns, and how Warmworks will deal with non-compliance with its policies
- **Complaints Procedure:** this allows end users – those whose homes Warmworks and our sub-contractors have worked on as part of the various schemes we manage – to raise any concerns they might have with the work or working practices they have witnessed

Training:

Warmworks ensures that all staff are given an induction, during which they are introduced to our policies and procedures. Inductions are tailored to the role that the new employee will be undertaking.

In view of the areas that Warmworks has identified as being the highest risk, specific training on modern slavery has undertaken by selected staff involved in procurement.

Our suppliers:

[Warmworks has a Supplier Code of Conduct, which is provided to all suppliers and sets out our values and our policy towards modern slavery, as well as what we expect from those in our supply chain.]

Warmworks takes an active role in assessing the ethical suitability in relation to modern slavery of the products that it uses in its projects. We are not content simply to assume that the UK importers from which we buy have done sufficient due diligence.

Warmworks assesses manufacturers against a risk matrix, informed by our due diligence, and will avoid procuring materials from sources where the risk index is considered too high.

Our sub-contractors:

Warmworks works with a large number of surveyors, installers and other third-party sub-contractors. Warmworks ensures that legally binding contracts are in place before a contractor does any work and includes modern slavery clauses in all of its contracts. Breach of modern slavery clauses in contracts are grounds for immediate termination.

In addition, Warmworks will be issuing all new sub-contractors with a modern slavery questionnaire, which allows us to assess that their working practices are legal and adhere to our values.

Since many of the end users with whom we work are vulnerable in some way, Warmworks often requires that its sub-contractors (including all staff within a company that will be engaging with a project) undertake a criminal disclosure check. This process is also used as an indication that sub-contractors' staff have the legal right to work in the UK.

Ongoing compliance monitoring:

Warmworks' modern slavery policy has been reviewed and approved by Warmworks' Chief Executive. The policy will be reviewed at least annually, so as to ensure that it is operating effectively and fit for purpose.

Approval:

This statement has been approved by Warmworks' Chief Executive, its LLP members, the Energy Saving Trust, Changeworks and Everwarm, and the Warmworks board at its meeting of 24 October 2022.

A handwritten signature in blue ink, appearing to read 'Ross Armstrong', with a long horizontal stroke extending to the right.

Ross Armstrong

Warmworks Scotland LLP Chief Executive