

## **Soltech Systems Ltd**

### **Modern Slavery Policy**

#### **Introduction:**

For over 25 years, Soltech Systems have been industry-leaders providing commercial blinds, curtains and shading solutions for an array of clients from multinational brands, to small private firms and individuals. We are known for our complete commitment, customer service and impeccable delivery.

At Soltech Systems, we recognise the importance of credibility, integrity and trustworthiness to our success as a business. We are committed to upholding high ethical standards and values and we believe in the principles of honesty, fairness and respect to our employees and our clients.

Soltech Systems Ltd has an annual turnover less than the £36 million set by the UK government as a requirement to publish a modern slavery statement. We do, however, work with companies who are obliged to comply with the Modern Slavery Act and we understand our responsibility towards them to ensure that any work we carry out on their behalf does not put them in breach. To this end, we have invested in developing knowledge around this key area and have procured the services of experts in the field of modern slavery to help develop policies and procedures to help prevent modern slavery from occurring in our organisation or within our supply chains.

Modern slavery is a hidden crime that affects over 40 million men, women and children from all walks of life and from all around the world, including the UK. It encompasses slavery, servitude, forced or compulsory labour, and human trafficking, and is a serious violation of human rights, depriving a person of their liberty and exploiting them for personal or commercial gain.

Recent studies indicate a worryingly high number of slavery victims working in the construction industry; some 18% of forced labour victims have been discovered in the sector. That over 50% of construction workers in the London area are believed to be EU migrants increases the risk to those companies operating in this region.

Soltech Systems recognises that the construction industry is one of the higher-risk sectors of the economy, due mainly to complex sub-contracting and long employment chains, with a constant need for a flexible cheap labour force who are engaged in low-skilled, manual work and are often (but not exclusively) migrants. In addition, much of the construction industry relies on lengthy supply chains in respect of materials, many of which may be sourced from countries identified as being at high risk of human trafficking and modern slavery.

Modern slavery is an abhorrent practice that will not be tolerated by the company. Soltech Systems is committed to operating openly and transparently, acting ethically and with integrity to ensure that there is no forced or compulsory labour in our own business or throughout our supply chains. We place the same expectations on our sub-contractors, suppliers and business partners. Regardless of any legal or statutory obligations, we will take whatever steps we can to detect and prevent this, simply because it is the right thing for us to do.

**The Policy:**

This Policy applies to anyone who works with or for Soltech Systems in any capacity. It is the responsibility of all of us to prevent, detect, and, if found, report any potential or suspected incidences of modern slavery or human trafficking as quickly as possible.

All current company policies are being reviewed to ensure that they act in accordance with this Policy with the view to preventing modern slavery occurring in this organisation or our supply chain. This will include specifically HR policies including recruitment of permanent and temporary staff, payroll issues to ensure that payment is made to individuals who have been engaged in work on behalf of the company, and in particular with caution over the use of third party employment agencies who, from time to time, may be called upon to supply staff on a temporary basis. The use of 'cash in hand' payments will not be permitted within the business and any such payments found to be occurring within the supply chain will be subject to deeper scrutiny and discouraged whenever possible.

All employees of Soltech Systems Ltd have a written contract of employment and are paid above the living wage, in addition, staff are entitled to, and receive, proper sick and holiday pay.

The company has a formal Grievance Policy and a Whistleblowing Policy to encourage workers to identify and report potential issues within the company, and for these to be resolved as soon as possible, without fear or retribution.

The company adheres to its recognised Health and Safety Policy and conforms with ISO 9001 and ISO 14001.

We make clear our expectations that all our sub-contractors, suppliers and business partners comply with this Policy. To this end, Soltech Systems will issue a Pre-Qualification Questionnaire (PQQ) requesting details of compliance with the Modern Slavery Act and may, if deemed necessary, seek evidence to verify activity undertaken to comply. We will also issue a Code of Conduct to all suppliers or goods and services setting out our expectations of them.

Following the training of key management staff, a comprehensive modern slavery risk assessment process has been carried out and a risk mitigation plan created. In addition, a comprehensive action plan has been developed, setting out detailed activities to be undertaken within the organisation and its supply chain to prevent and reduce the risk of modern slavery. Progress against the action plan and this, along with the Policy, will be reviewed and updated accordingly on an annual basis.

**Responsibility:**

The Managing Director of the company has overall responsibility for the Policy, however, its day-to-day implementation is co-ordinated and overseen by the General Manager who will act as "champion" for this issue on behalf of the organisation. This role will provide clear lines of reporting and ensure that all activities agreed and undertaken will be driven and monitored at executive level. The subject of modern slavery will be included as a standing agenda item on all strategic meetings with appropriate updates and progress reports being delivered.

**Communication & Awareness:**

All key directors and managers have received awareness training on human trafficking and modern slavery issues and have participated in conducting a comprehensive risk assessment process for our business. Each member of the management team is responsible for communicating and disseminating this Policy to all employees, sub-contractors and other partners, under their sphere of responsibility. The induction process for all employees will be updated to include an awareness of modern slavery and this Policy. This also extends and applies to any temporary staff employed by the company.

**Compliance and Reporting:**

All members of staff must ensure that they read, understand, and comply with this Policy. Any concerns should be reported to a manager or through the organisation's Whistleblowing Policy where the issue will be dealt with on a confidential basis and in good faith. The person receiving the report will take any urgent action necessary before bringing the issue to the attention of the management team, or Managing Director, as a matter of urgency. Breaches of this Policy will potentially constitute gross misconduct and will be dealt with at high management level.

If a supplier or sub-contractor is found or suspected to be in breach of this Policy, they will be required to conduct an urgent review and report their findings to the management team. Such breaches could result in contract termination or a requirement to put in place steps to prevent future breaches. Any criminal offences that come to the attention of Soltech Systems will be referred to the appropriate agency, with the consent of the victim if appropriate.

**Key Performance Indicators:**

The company will measure the number of PQQs issued and returned, and the number that fail to meet our required standards.

We will also measure the number of Supplier Code of Conduct documents issued and the acknowledgement of compliance from all suppliers and sub-contractors.

The company will monitor any reports of modern slavery found in the business or within its supply chains.

**Review of Policy:**

This Policy, and updates regarding progress against the action plan, will be included at regular strategic management meetings. The Policy will be formally reviewed on an annual basis and amended as and when necessary.



**Guy Simmonds**  
**Managing Director**

Date: January 2020