



*Where this document refers to Fortel it shall mean all Fortel Group Companies including Fortel Services Limited, SkyBlue Recruitment Limited T/A SkyBlue and Nexus Security Limited, unless otherwise stated.

Modern Day Slavery Statement

Purpose

This statement for the year ended 31 December 2023 has been published in accordance with Section 54 of the Modern Slavery Act 2015. The purpose of this statement is to set out the steps taken by Fortel and our relevant group companies to prevent modern slavery and human trafficking within our business and supply chain.

Introduction

Fortel's vision is to be the trusted partner for providing services, delivering a service that brings lasting benefits to our customers and the communities in which we live and work.

At Fortel, our Values are at the heart of everything we do. They drive our commitment to delivering safe, sustainable and effective solutions for our customers and to creating positive legacies wherever we work.

We believe that an integrated approach to human rights, by embedding it into our policies, business systems and processes, allows us to efficiently and effectively manage human rights within our existing ways of working. Our approach applies to all our workers. We aim to bring lasting benefits to the communities in which we work and create positive legacies wherever we work.

Fortel strongly condemns slavery in all of its forms. We are fully committed to working with our customers, our business teams, our supply chain partners and the Gangmaster Labour Abuse Authority to support human rights and the welfare of the workers working on our contracts and projects. We are committed to taking measures to prevent the occurrence of modern slavery in our business or supply chains, and to monitoring the effectiveness of those measures.

Organisational structure and supply chains

Fortel comprises 5 business units:

- Fortel Services Limited, a leading provider of temporary labour into the construction industry; and
- SkyBlue Recruitment Ltd, a recruitment business offering permanent and temporary recruitment solutions into the construction, facilities management and rail industry sectors; and
- Nexus Security a provider of security guarding personnel and CCTV operations; and
- Fortel Concrete Division, the UK's only provider of internal and external concrete flooring; and
- Nexus decontamination and relocation, a business offering office relocation services and deep clean decontamination services to both the public and private sectors.

The health and safety, working conditions and wellbeing of our employees and temporary workers are high priorities for Fortel. We set high standards of corporate governance, supported by training and policies/ procedures which are applied throughout our businesses. These cover human rights and our social responsibility.

Our supply chain consists of two tiers, including approximately 60 direct suppliers. We only use suppliers who have been vetted and approved to be on our preferred supplier list. Approval of suppliers is authorised by our Commercial & Compliance Teams who have received modern slavery training.

Our Values and Policies

Fortel has integrated modern slavery prevention into our core policies, commitments, and training to ensure that our employees understand their essential responsibilities.

Ethics and Business Integrity

Our Bribery policy, values, training, modern slavery policy and guidance sets out the core standards and behaviours that all Fortel employees are expected to meet, wherever in the business they operate. The document also provides more detailed information on various ethical issues and identifies who should be contacted for assistance or to report a breach of the Policy. The Policy has been updated to include information about modern slavery and how to report a suspected incident.

Whistleblowing hotline



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Fortel has a Speak Up (Whistleblowing) Policy and a whistleblowing hotline is provided to allow all of our people and third parties to report incidents of malpractice. Reports can remain anonymous and any incident that is a potential slavery or trafficking event is identified as high alert, to be dealt with immediately by our HR Manager Veleta Smith-Carter and Chief Operating Officer Amar Sandhawalia.

Fortel aims for a high standard of governance within our business, and has implemented policies, procedures and mandatory training designed to create a responsible business culture, which defines the way we do business and enables us to achieve high-standards of customer service, risk management and accountability.

The main modern slavery prevention practices that Fortel sets out are:

- No use of child labour;
- No use of forced, prison or compulsory labour;
- No payment of recruitment fees by workers;
- Compliance with all applicable laws and regulations on freedom of association and collective bargaining;
- A safe, secure and healthy workplace and not tolerating discrimination, harassment or retaliation;
- Compliance with all applicable laws and regulations on working hours;
- Providing wages and benefits that meet national legal standards

Training

As part of Fortel's commitment to eradicating modern slavery, we want to ensure that all of our people understand what is meant by modern slavery, understand how to recognise it, and how to act in the event that they consider that somebody is a potential victim of modern slavery.

We have developed and rolled out face-to-face training modules for all of our employees.

All Fortel senior business leaders and Key Account Managers have undertaken and received accreditation from the Chartered Institute of Procurement & Supply in Ethical Procurement and Supply.

Given the diverse nature of our business, we also hold regular briefings at site level.

Assessment of risk in the supply chain and due diligence of suppliers

Risk assessment procedures have been implemented to identify potential risks of modern slavery across our business and supply chain. Risks are identified and assessed at an initial stage in risk assessment reports; it is then determined what potential mitigations and control measures can be implemented to prevent and eradicate such risks. The potential risks are then re-assessed to provide a final risk rating, once the mitigation and control measures have been applied.

Supply chain

We are aware that our biggest risks lie in our supply chains. To combat such risks, we have a policy of only contracting with accredited and approved supply chain partners. We ensure that all new contracts contain modern slavery clauses and all suppliers may be subject to audits, that are carried out onsite and include interviewing workers.

We expect our suppliers to support and demonstrate our values, which are an essential component of our approach to Sustainability. The standards we expect from our suppliers address a broad spectrum of working conditions including, but not limited to, fair remuneration, working hours, no child labour, respect, non-discrimination, health safety and wellbeing, as well as freedom from forced labour. We will assess all instances of non-compliance, taking appropriate remedial action in a timely manner and as expeditiously as possible.

We recognise that particular types of suppliers are likely to give rise to a higher risk of modern slavery, in particular those utilising lower-wage, low skill staff such as construction workers, security, couriers, cleaning, agriculture and those utilising manufacturers in low-wage countries.

Where, through risk assessment, we perceive a particular risk of modern slavery, we will continue to undertake enhanced due diligence, asking additional questions during the procurement process tailored to the specific risks to ensure the supplier meets acceptable standards.

All suppliers are subject to a program of audits with or without notice.

Audits

All of our suppliers' operations are subject to Audit by our accredited internal audit team. Worker interviews, where appropriate, are conducted as part of that audit program. Non-conformances or non-compliances are flagged internally and closed out. Any



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evidence of modern slavery or suspicions of such are communicated to the Gangmaster Labour Abuse Authority as part of our commitment to the Construction Protocol, which we help to establish.

Contracts / Legal Documents

Fortel has amended our standard contractual terms for suppliers to include obligations on suppliers to comply with the Modern Slavery Act. This requires suppliers to maintain records that allow traceability throughout our supply chain, to report breaches and to detail the steps taken to ensure there is no slavery or human trafficking in their operations. Fortel may terminate a supplier agreement with immediate effect if it identifies that a supplier is breaching or has breached Fortel's policy on anti-slavery and human trafficking.

Engagement and Focus

During 2023 Fortel have led a number of presentations and training sessions with its supply chain partners

Shared its practises and documentation used to achieve the Achilles Ethical Employment Accreditation with its competitors it works with under a collaboration agreement.

Fortel will work to promote anti-slavery in 2024by:

- Further raising awareness of and provide training on Modern Slavery across the business;
- Continuing to monitor and mitigate the risk areas in our supply chain;
- Ensure further consistency and visibility of the supply chain by reducing the number of suppliers being procured outside of the centralised function;
- Continuing to work with the Gangmasters Labour Abuse Authority's and remain a strategic contributor to the GLAA's Construction Protocol.

Reporting

If you have any concerns in relation to modern slavery it is essential that you report them. You can report it in confidence and anonymously.

- Fortel Senior Leadership Team: Lyn Redsell compliance@fortel.co.uk;

or you can also report directly to the authorities:

- Modern Slavery Helpline 0808 801 0372 8am to 8pm - 7 days a week
- Download the [Unseen.org](https://unseen.org) app

Approved by the Group CEO on the 29th February 2024