

OESL FY23 Modern Slavery Statement

March 2024

www.oldlandmandeservices.co.uk



Introduction

This is our second annual Modern Slavery Statement. It has been prepared for Oldland Electrical Services Ltd (“OESL”) pursuant to section 54(1) of the UK Modern Slavery Act (MSA). This Statement also covers Oldland M&E Services Ltd, wholly owned subsidiaries of OESL. It sets out the actions taken to identify, assess, address, and prevent modern slavery in our operations and supply chains for the financial year ended 31 August 2023 (FY23).

This Statement forms part of OESL's Environmental, Social and Governance (ESG) commitments. We believe sustainable growth is the only way to build a successful business and have a lasting impact on the world. Our Impact Plan – which brings together our Environmental, Social and Governance (ESG) commitments and the progress we’re making against these – holds us accountable for achieving this. Using Our Values as a guide, Our Impact Plan clarifies our commitments and actions across four important categories: Planet, People, Prosperity and Governance. It demonstrates our purpose – to inspire confidence and empower change – and Our Values in action.

We have committed to voluntarily report our ESG performance in which aim to bring consistency and comparability to ESG reporting across sectors, industries and geographies. In reporting against these metrics, we are increasing our transparency on the

way we run our business (Governance), our impact on the environment (Planet) and in driving greater prosperity for our people, communities and clients (People and Prosperity). Our Modern Slavery Statement forms part of our response to these metrics.

This year marks the 11th anniversary of the United Nations Guiding Principles on Business and Human Rights (UNGPs), the authoritative standard for corporate human rights.

OESL has made a commitment to respect human rights, including seeking to eliminate all forms of forced, compulsory and / or child labour from its operations and value chain, in line with UN.

While our services are not considered a high-risk sector for labour-related breaches, we are acutely aware that risks can arise across our operations and supply chain. We have a critical role to play in managing potential harm to people through a risk-based approach to human rights due diligence.



Planet



People



Governance



Prosperity

Executive Summary

This Statement is intended to provide an update on the progress made by OESL over the course of FY23 to strengthen our approach to the detection and prevention of modern slavery within our business and supply chains.

OESL continues to recognise the substantial impact that COVID-19 has had on the lives of people, particularly on the increased vulnerability of workers in global supply chains. We have worked closely with our people and suppliers to support them through the pandemic and continue to do so.

FY23 key highlights:

- We looked at all of our internal OESL policies and instigated a policy refresh.
 - We updated our Code of Conduct in line with our refreshed Values.
 - We broadened our supply chain risk assessment criteria by lowering the spend threshold for triggering enhanced due diligence, thereby increasing its scope.
 - We reviewed and enhanced our supplier questionnaires and the weightings assigned to each criteria to enhance effectiveness and scope.
 - All members of our team received updated training on modern slavery. This training will also be provided to all new joiners of the team going forward to increase knowledge and understanding of the risks and indicators of modern slavery.
- We developed and enhanced our modern slavery Key Performance Indicators (KPIs) in our supply chain to help track progress.
 - All colleagues received training on Suspicious Activity Reporting (SARs) as part of annual financial crime training. Given modern slavery is a predicate crime to financial crimes such as money laundering, strengthening colleagues awareness of the SARs process enhances our modern slavery risk mitigation effort.

The remainder of this Statement sets out our approach to modern slavery risk management in line with the six recommended reporting areas set out by the UK Government.

Our Business, Structure and Supply Chains

OESL is incorporated in the UK as a limited Company. OESL is a private English limited Company which provides a service to clients.

OESL provides a full range of professional services to business, governments and the public-sector.

OESL's primary focus is to provide professional services, notably mechanical and electrical services. OESL works wholly within the UK, operating out of 1 UK office. References within this Modern Slavery Statement to our 'colleagues' or 'people' means employees of OESL and Oldland M&E Services Ltd.

OESL has one subsidiary with a turnover of more than £500,000: Oldland M&E Services Ltd. OESL wholly owns and controls it. It is subject to the same policies and procedures as OESL.



Our Business, Structure and Supply Chains

(continued)

Where we source

As a professional services firm, we purchase goods and services from suppliers for the operation of our business. Our supply chain includes our supplier and subcontractor relationships. The ways in which we mitigate the risks presented by each of these relationships is detailed below. In FY23, OESL had 48 active suppliers. All of our £1 million annual supplier spend in FY23, was spent with suppliers based in the UK.

According to the Global Slavery Index, the UK, (where 100% of our supplier spend is located), has a lower prevalence ranking for modern slavery. However, we are acutely aware that

slavery-like practices can and do occur in the UK in certain higher risk categories.

Manufacturing and travel are often exposed to the highest risks of modern slavery in our organisation. The labour in these categories tends to be base-skilled, manual labour and the workers tend to be vulnerable populations including migrant workers. These risks have been identified through our risk assessment processes and are managed through our rigorous due diligence procedures as detailed later in this report (Risk Assessment and Due Diligence).

Supplier jurisdiction by spend:

UK100%



Our Policies

OESL has a zero-tolerance stance on modern slavery. For us, this means having a comprehensive policy that aims to prevent, eliminate, and educate on modern slavery and human trafficking. OESL is currently going through an internal refresh of all our policies, which we aim to complete in FY23. Below we set out our key policies that relate to modern slavery and human rights.

OESL Human Rights Statement

Our [Human Rights Statement](#) establishes OESL'S commitment to respecting human rights. In following the UNGPs, OESL seeks to prevent adverse human rights impacts caused by its business relationships and to address any impacts that occur.

Our Code of Conduct and Values

[Our Values](#) – integrity, excellence, courage, together, for better in everything we do. Doing what is right and doing what matters is core to how we operate. Instilling ethical behaviour within OESL's operations begins with:

[Our Code of Conduct](#), which was last updated in March 2021. Our Code includes a personal commitment to follow Our Values and respect the human rights of all individuals with whom we deal. Our Code also encourages colleagues to report unethical behaviour, which may include issues related to modern slavery.

Any breaches of Our Code may lead to disciplinary action, up to and including dismissal, as well as potential civil and criminal liability. For employees who are members of a professional body, a breach will often result in a report of wrongdoing.

Anti-Slavery and Human-Trafficking Policy

This policy applies to our employees, and subcontractors and reaffirms our strict zero tolerance approach to instances of forced labour and human trafficking. It sets out the potential sanctions for breaches of this policy and an obligation to report any suspected acts of non-compliance from within the business.

Financial Crime Policies

Our internal Financial Crime and Anti-Money Laundering (AML) policies and procedures support OESL to identify, assess, manage, and mitigate financial crime risks, including modern slavery and human trafficking. To better enable our people to identify and mitigate risks of financial crime, they will undertake annual mandatory Anti-Bribery and Corruption training.

Supplier Code of Conduct

We expect our suppliers to share our high standards of ethical behaviour. Our [Supplier Code of Conduct](#) reiterates our dedication to eradicating modern slavery and human trafficking in our operations and requires suppliers to share the same commitment. Our Supplier Code of Conduct includes provisions around adherence to all relevant laws on minimum age requirements, wages, working hours, and forced labour. Our Supplier Code of Conduct is underpinned by the United Nations Global Compact. Where we feel that a supplier has fallen short of our standards, OESL will work to ensure remedy. If the supplier fails to resolve their issues in an acceptable manner, we will consider terminating the relationship altogether.

Our Policies

(continued)

Inclusion, Diversity and Equity Policy

Our Inclusion, Diversity and Equity Policy promotes a work environment where each person is treated equally irrespective of differing characteristics. The policy outlines our commitment to these values and the process for reporting discrimination, inequality, and harassment based on any protected characteristic under the Equality Act, 2010. Inclusion, Diversity, and Equity team review and monitor processes, policies, and procedures to ensure promotion of equity across all levels of OESL.



During 2022, we:

Initiated a refresh and update of all our internal OESL policies.

Updated our Code of Conduct in line with our refreshed Values.



In 2023, we will:

Update our Supplier Code of Conduct to include additional human rights and labour provisions.

Review and update our Anti-slavery and Human Trafficking Policy.

Risk Assessment and Due Diligence

The term ‘modern slavery’ describes exploitation so severe that people have their liberty taken away for someone else’s profit or benefit. Modern slavery is an umbrella term that includes slavery, servitude, forced labour, debt bondage, human trafficking, and the worst forms of child labour. The following section sets out how OESL identifies, assesses, addresses, and prevents modern slavery risk.

The risk of modern slavery or slavery-like practices is increased when the following indicators are present:

1. High-risk categories and products – certain products and industries are associated with a higher risk of modern slavery. For example, construction, manufacturing, cleaning, food processing, transport, security, etc. High-risk products include bricks, timber, carpets, laptops, computers and mobile phones.
2. High-risk jurisdictions – although modern slavery can occur anywhere in the world, there are some countries where the risk is higher, for example where there is conflict, corruption, weak rule of law, etc.
3. Vulnerable populations – nature of the workforce such as reliance upon base-skilled or unskilled labour, high numbers of temporary, seasonal, migrants, minority groups and children.
4. Business models structured around high-risk work practices – such as recruitment agencies, subcontracting, outsourcing and complex ownership structures.

Where multiple modern slavery risk indicators are present, there is a greater likelihood of actual harm being experienced. Modern slavery risk indicators guide our human rights due diligence processes, to ensure our efforts are focused on where there is likely to be the risk of harm to people.

In addition, we carry out measures to ensure that workers in our organisation and supply chain are not trapped in debt bondage.



Vulnerable populations



High-risk categories



High-risk business models



High-risk jurisdictions

(continued)

Employees

OESL operates in the construction sector, employing highly skilled individuals and we are mindful of possible risks regarding our people and carry out robust checks prior to employment to ensure that modern slavery does not take place in our business. This includes interviews and pre-screening of our people including identity checks, right to work, references, criminal records and DBS checks.

Our employees are required to complete training on Our Code of Conduct on an annual basis to help embed Our Code in our culture. Our employees are also required to sign an annual declaration, making a personal commitment to behave ethically and to report any concerns.

These declarations are made when the individual joins OESL and with an annual refresh. It is the responsibility of everyone at our firm to escalate concerns or signs of modern slavery or unethical behaviour.

We have numerous ways in which our people can speak up, including through our Ethics Colleague.

We are committed to ensuring that all our people are paid fairly. This is an important aspect of our modern slavery position and is a vital step in reducing vulnerability to slavery-like practices.

Ethics Colleague

We have an Ethics Champion on the firm. Anyone can approach the Ethics Champion, no matter their capability. As well as helping our people to report or discuss any ethical issues or concerns, she will also help to identify and address any examples of poor ethical practices.

Speak Up

We encourage our employees to Speak Up and approach the Ethics Colleague.

Other routes to speaking up

To guide our colleagues on the best route for raising concerns, information is available in the employees Handbook.

We recognise that speaking up takes courage. We remind our colleagues of the wellbeing support available to them to support them in this process.



Number of Ethics Champions

>1

FY23



Reports to Ethics Champions

0

FY23

(continued)

Due diligence

Our approach to due diligence is guided by best practice, supply chain monitoring, and ongoing conversations with modern slavery subject matter, to assess changes to modern slavery risks in our business and / or supply chain and provide relevant actions to mitigate arising risks.

At the supplier selection stage, suppliers with estimated spend greater than £100k are requested to complete the Sustainable Procurement Questionnaire, which includes questions in relation to modern slavery. Suppliers' responses are reviewed and scored to assess the controls they have in place to mitigate the risk of modern slavery. The Sustainable Procurement Questionnaire is a prime example of how OESL considers more than just price when selecting a supplier and is committed to reducing the risk of modern slavery in our supply chains.

At on-boarding, all suppliers undergo adverse screening, including for modern slavery and human rights indicators. Tier one and tier two suppliers are subject to continuous risk monitoring including media screening. Relationships that are rated as high and medium risk in the risk assessment process are subject to additional due diligence through the Modern Slavery Assessment Tool (MSAT) produced by the UK Government. The Tool focuses on the key policies and procedures that our business relationships have in place to identify, assess, and address modern slavery risk in their operations and supply chains. For suppliers who score poorly in the Assessment, we will engage with the supplier to discuss their approach to modern slavery risk management. Where necessary, we will provide suppliers with recommendations on how to improve their modern slavery control environment.

Managing risk

As mentioned in our Policy section, our Supplier Code of Conduct ("Supplier Code") describes the expectations we have of our suppliers to conduct business in a responsible manner, including with respect to compliance with the requirements of applicable slavery, forced labour, child labour, and human trafficking laws. The Supplier Code requires suppliers to align their guidelines, policies, and practices with the Supplier Code and communicate and enforce the Supplier Code provisions throughout their organisations and supply chains.

If a supplier falls short of our standards, we will engage with the supplier and provide recommendations on how they can improve their modern slavery policies and processes. If a supplier fails to implement remediation processes within an acceptable timeframe, we will consider terminating the relationship.

Clients

OESL's primary focus is to provide professional services to clients. If any of our clients are linked to slavery-like practices or poor working conditions in their operations or supply chains, we could be associated through the services we provide.

Training

Modern slavery training is fundamental to raising awareness within organisations and building employee capabilities to mitigate risks and appropriately escalate concerns.

Modern slavery training was most recently provided to colleagues in FY22.

On an ongoing basis all new starters to the firm are required to complete a modern slavery training based on the internal FY22 firm-wide training. The objectives of the training was to raise awareness of modern slavery, inform participants of the role the firm and colleagues have in mitigating risks, and equip them to do so by providing an overview of the key risk indicators relevant to colleagues and contractors. The training was/is mandatory for all colleagues and had a completion rate of 100%. A refreshed version of this training is due to be provided in FY23.



During 2023, we:

Provided our teams with updated training on modern slavery.



In FY23, we will:

Review and refresh our firm-wide modern slavery training. All colleagues will sit this mandatory training course in FY23.

Continue to provide our teams with annual training on modern slavery.

Offer modern slavery training to high-risk suppliers, particularly those who scored poorly on SAQs.

Continue to communicate with our people over the course of FY23 to build a culture of awareness around modern slavery.

Effectiveness

OESL recognises that our review and assessment of our actions to identify and address modern slavery risks across our operations will be an ongoing and evolving process. We use the following Key Performance Indicators (KPIs) to better understand the effectiveness of our approach to managing modern slavery risks:

	FY22	FY23
% of employees receiving firm-wide training on modern slavery	100%	N/A
Number of modern slavery reports*	0	0
Number of high and medium-risk suppliers requested to complete the SAQ	0	0
% of suppliers who responded to the SAQ	100%	100%
% of assessed suppliers that have a Modern Slavery Statement (if required)		100%
% of assessed suppliers that meet the minimum legal requirements for a Modern Slavery Statement set by the UK Government		80%
% of assessed suppliers that have a Whistle-blowing Mechanism		80%

**In FY22& FY23, we had no reported incidents of slavery or human trafficking. However, we understand that modern slavery and human rights breaches can be difficult to detect, and we remain committed to improving our processes to better identify, address, and combat occurrences.*



During FY23, we will:

Develop additional modern slavery KPIs

Governance and Approvals

We recognise the importance of a collaborative approach to addressing modern slavery across OESL. Our company reviews the effectiveness of our modern slavery programme and drives forward our approach to tackling modern slavery.

The Company meets at least once a quarter. Accountability for modern slavery relating to our business resides with the Company Secretary. Day-to-day responsibility for the management of our programme is led by Risk and

Compliance. OESL's Board is responsible for ensuring there is a satisfactory framework for managing cultural, ethical, risk and reputational matters affecting OESL. This Statement has been reviewed, before being presented to the Board for approval.



During FY21, we:

Reviewed and increased the members of our Modern Slavery Working Group to include the MLRO.



In FY23, we will:

Continue to review the members of our Modern Slavery Working Group and add additional members as required.

This Statement was approved by the member's of the Board of OESL on behalf of OESL on the 4 March 2024.

Jon Darby
Managing Director
OESL
4 March 2024

Get in touch:

If you have any specific concern about modern slavery or human trafficking taking place in our business or supply chains, please get in touch.

