

# SLAVERY AND HUMAN TRAFFICKING STATEMENT

## **Slavery and Human Trafficking Statement**

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the company's slavery and human trafficking statement for the current financial year.

#### Introduction

We all have a responsibility to be alert to the risks, however small, in our business and wider supply chain. All employees are expected to be aware of the possibility that Slavery and Human Trafficking may occur and to report concerns they may have to a senior manager at the earliest opportunity. Managers of the company are required to act whenever any concerns are raised whether from within or from outside of the business.

#### **Organisation's Structure**

Lucas UK Group Ltd is formed of Lucas Finishing Specialists Ltd & Lucas Fit Out Ltd, both construction companies based solely in the UK. The company's head office is in Wrotham, Kent.

#### Our Policies on Slavery and Human Trafficking

We are committed to ensuring that modern slavery or human trafficking plays no part in our supply chain or in any part of our business.

We are committed to acting ethically and with integrity in all our business undertakings and to implement and enforce effective systems and controls to, as far as practicable to ensure slavery and human trafficking is not taking place anywhere in the company or our supply chain. To assist we ensure our recruitment processes are transparent and reviewed regularly. We have robust procedures in place for the vetting of new employees and ensure that we can confirm their identities and that they are paid directly into an appropriate, personal bank account.

#### Accreditations

We are Members of SEDEX, Stronger Together and were Achilles Modern Slavery Audited in 2022.

## **Our Supply Chain**

Our supply chain comprises the engagement of subcontractor organisations to carry out works and services on projects and the sourcing of materials and manufactured products. We are committed to ensuring that slavery and human trafficking plays no part in our supply chain or any part of our business.

As part of our initiative to identify and mitigate risk:

- Where possible we build long standing relationships with our suppliers and subcontractors and make clear our expectations of business behaviour, while seeking relevant assurances from our supply chains that they remain legally compliant, ensuring that they provide such evidence in a timely manner to support our audit trail.
- We have in place systems to encourage the reporting of concerns & the protection of whistle blowers.
- Where appropriate, we require our supply chain partners hold an SSIP accreditation and have completed our pre-qualification process. These requirements require our supply chain to demonstrate the steps taken to ensure that slavery and human trafficking is not taking place in any part of their business.

## Supplier Adherence to and effectiveness of our Values

We have zero tolerance to slavery and human trafficking, and we expect our staff and all those in our supply chain and contractors to comply with our values, therefore we reserve the right to make periodic checks to ensure the effectiveness of these values, while reserving the right to initiate sanctions on those who are non-compliant.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide annual training to relevant members of staff to enable them to assess and manage and mitigate the risk. All directors have been briefed on the subject.



Danny Lucas Executive Chairman & Managing Director 3<sup>rd</sup> January 2023