

Robertson: Modern Slavery Act Transparency Statement

Introduction from the Executive Chairman

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 for the current trading year to the 31st March 2018 and sets out the steps that the Robertson Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Robertson Group has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.

Organisation structure

The Robertson Group is a privately-owned portfolio of individual companies working in infrastructure, support services and construction throughout the UK.

There are currently 21 Robertson business units within the group portfolio covering a diverse range of services to the industry. Our businesses include timber engineering, facilities management, a capital projects business dedicated to public sector partnerships, regeneration, property development, Major projects, regionally based construction companies, civil engineering, building services, and businesses that deliver high-quality homes for the private and affordable markets.

Our approach to policy and procedure encompasses all areas of the group portfolio. For the avoidance of doubt, this Modern Slavery Act Transparency Statement covers not only Robertson Group but each of the individual trading businesses listed below that meet the requirements identified in the Modern Slavery Act.

Company	Co Number
Robertson Group Limited	SC60077
Robertson Construction Group Limited	SC347921
Robertson Construction Northern Limited	SC249934
Robertson Construction Eastern Limited	SC249936
Robertson CE Limited	SC249935
Robertson Construction Tayside Limited	SC292999
Robertson Construction Central Scotland Limited	SC249933
Robertson Homes Limited	SC151825
Robertson Facilities Management Limited	SC185956
Robertson Regeneration Limited	SC303903
Robertson Partnership Homes Limited	SC211357
Robertson Timber Engineering Limited	SC166924
Robertson Capital Projects Limited	SC227159
Robertson Property Limited	SC103106

Policies

The Robertson Group has in place a number of policies to ensure that we are conducting our business in an ethical and transparent manner. These include:

1. Recruitment policy.
2. Whistleblowing policy.
3. Ethical Procurement policy
4. Equal Opportunity policy

Any breach of Robertson Group policy will be regarded as a serious matter and will result in appropriate actions being undertaken.

Our supply chain

As a result of our diverse business structure, our engagement with the external supply chain has developed to provide the sourcing of subcontract services, products and materials direct from manufacturers and through third-party distribution channels and the provision of agency labour.

The Robertson Group conducts due diligence on all suppliers, the due diligence includes an online search to ensure that suppliers have not been convicted of offenses relating to modern slavery.

In addition to the above, as part of our contract with any supply chain member, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own supply chain to account over modern slavery
3. They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. The Robertson shall enforce its contractual rights should any instances of modern slavery come to light.

We are fully committed to making sure that no business practices – either internally or through our external supply chain – that would contravene Section 54, clause 5 of the Modern Slavery Act are tolerated.

Due diligence and risk awareness

Employees:

Compliance with this policy forms part of all employees' obligations under their contract of employment. Employees are required to familiarise themselves with all policies and procedures to assist in the identification and prevention of criminal acts.

External supply chain:

We currently trade with circa 3000 supply chain members who are committed to meet both legal and ethical standards in their daily operations, while ensuring that compliance is managed appropriately across their own supply chain partners.

We recognise our statutory obligation to set out the steps we have taken as a business to ensure that no acts of modern slavery or human trafficking are evident in our supply chain. However, we also acknowledge that we do not control the conduct of individuals and organisations within our supply

chain. To support our commitment, we have during the financial year ending 31st March 2017 developed and implemented the following measures:

- Developed our supply chain prequalification process to incorporate specific checks relating to modern slavery and human trafficking ensure appropriate levels of compliance at an introductory stage of the process.
- Delivered a programme of awareness for all employees through targeted internal communications relating to the key requirements of the act.
- Associate membership of the Considerate Constructors Scheme (CCS), we actively supported the spotlight campaign on illegal workers across all sites.
- Introduced a recruitment Preferred Supplier Listing (PSL) to support our compliance with UK Immigration and Employment Law.
- Amended contractual documents enforcing our supply chain confirm their adherence to our policies while accepting our right to audit their activities and wider supply chain relationships
- Developed our relationship as a partner with the Supply Chain Sustainability School to support the collaboration across the wider construction industry in increasing awareness and adoption of good practice in dealing with Modern Slavery.
Developed and deliver training through our E-learning Academy to support awareness and compliance across our business and through our external supply chain.

The Robertson Group is committed to continually reviewing and updating our approach to identifying and managing risk associated with our supply chain, we have committed to undertaking the following steps during the current financial period:

- Further enhance our prequalification programme through the introduction of a right to work passport for both major and high risk supply chain members. This will provide a requirement to undertake Robertson approved training relating to the Modern Slavery Act.
- Fully introduce updated suite of contractual documentation into the day to day operations across our group
- Develop a supply chain assessment to identify high risk areas to direct our focus for future actions.
- Introduce a group wide audit programme across all sites to ensure compliance and take appropriate actions based on findings
- Continue to drive awareness across all sites through appropriate messaging, workshops and training for both Robertson staff and those from the external supply chain
- Further engage with all suppliers of Temporary Labour ensuring their compliance with our policies and procedures.

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will measure the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that Modern slavery practices have been identified.

Declaration

This statement is made in accordance with our obligation to Section 54, Clause 5 of the Modern Slavery Act and will be reviewed and updated annually by the Robertson Group Board.



Derek W. Shewan
Chief Operating Officer
Robertson Group