



Modern Slavery Statement

Pursuant to section 54 of the Modern Slavery Act 2015

www.sitecgroup.com

MODERN SLAVERY STATEMENT

This statement is made pursuant to section 54 of the Modern Slavery Act 2015.

Sitec has a zero-tolerance approach to Modern Slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. We believe in treating people with respect and dignity, and do not condone the use of our products or services to infringe upon the basic human rights of others.

Our policy reflects the practices and controls in place to minimise the risks of modern slavery practices infiltrating our operations and supply chain and applies to all persons and or companies working for, or on behalf of Sitec, in any capacity.

Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on Modern Slavery where necessary. All personnel are responsible for the prevention, detection and reporting of Modern Slavery

Our zero-tolerance approach to Modern Slavery is communicated to all suppliers including but not limited to service providers, contractors, external consultants, second tier suppliers, umbrella Intermediaries, third-party representatives and business partners.

Suppliers who meet the required criteria to report and comply with the Modern Slavery Act are asked to provide copies of their Policy and Procedures. Suppliers who do not meet the criteria are asked to agree and comply with our Policy and Procedures.

Organisational Structure & Operations

- **The organisation's structure**

Sitec is a privately owned company with a group wide turnover of over £50million, engaging in excess of 600 personnel either within group offices or deployed on contracts with our clients. The registered office is in Bath with main activity operating out of offices in Bristol, Yeovil and Southampton.

- **The organisation's business**

Sitec operate two main business streams comprising of Offload Project Management, Design & Stress Analysis support and Recruitment Services predominately in the Aerospace, Defence, Nuclear, Petro-Chemical and Utilities industries. Sitec operates predominately in the UK and India.

- **The Organisation's Supply Chain**

Sitec expects all Suppliers to uphold high standards in all business practices on both sides of the business. Suppliers to the Offload support business principally relate to the provision of Design support, Training or Manpower. Recruitment Services suppliers are principally related to the provision of manpower and manpower services through Limited Companies. Other Suppliers across the group provide Equipment and office consumables.

Risk & Due Diligence

- **Assessing and managing risk**

Due to the sectors, geographical locations and strict regulations and legislation to which Sitec operate, the risk of encountering Modern Slavery is minimal; however, Sitec has a responsibility to be alert of the risks however small within our Business and Supply Chain.

Where possible, we build long standing relationships with our Suppliers and make clear our expectations of business and corporate behaviour from the outset and seek their agreement and adherence.

Supply agreements with manpower and or manpower service companies will only be with UK registered companies.

All Personnel engaged direct or via the supply chain will have their Identification, Right to Work and Engagement/Payment status checked prior to engagement.

- **Due diligence in our business and supply chain**

For relevant Suppliers who meet the required criteria to report and comply with the Modern Slavery Act, Sitec will contact the Company to ensure they comply by requesting a copy of the company's policy statement and procedure.

For Suppliers who do not meet the required criteria to report and comply with the Modern Slavery Act, Sitec will contact the supplier to request they view, agree and sign to comply with Sitec's Modern Slavery Policy.

For personnel who work within Sitec offices, an induction is carried out that includes making the personnel aware of all company policies and procedures, including Modern Slavery, and requires them to sign documentation to confirm they have read, understood and agree to comply with the policy.

Awareness, Reporting and Non-Compliance

- **Internal awareness**

The policy Statement is issued on an annual basis and is displayed within all company offices and published on the Organisations Intranet. All Sitec personnel are responsible for the prevention, detection and reporting of Modern Slavery in any part of our business or supply chains. Personnel are required to avoid any activity that might lead to a breach of this policy, and the Modern Slavery Act 2015.

- **Internal Reporting**

Personnel are encouraged to raise concerns about suspicions of Modern Slavery in any parts of the business or supply chains at the earliest possible stage. Personnel are advised to notify the site manager as soon as possible if they believe or suspect that, a conflict with, or breach of, this policy has occurred, or may occur, in the future. The reporting of any suspected breach will be protected in accordance with the company's Whistleblowing Policy.

- **External awareness**

The Policy Statement is published on the Organisations Website and a copy can be issued direct on request. Where applicable, a copy may be issued to companies within the supply chain for agreement and compliance with the organisations Policy statement and or the Modern Slavery Act or will be directed to the organisations Policy statement for subsequent agreement.

- **Non-Compliance**

Any personnel who breach this policy will face disciplinary action which may result in action up to dismissal in accordance with Sitec's Disciplinary procedure.

We may terminate our relationship with other workers, suppliers or service providers within the supply chain who do not comply and or breach this policy.

Performance and Effectiveness of the Policy

- All organisational policies and their performance are reviewed for effectiveness during the annual quality management review meeting which takes place at the end of the Sitec financial year (July). This will include the review of any reports of non-compliance, internally or externally, and any subsequent actions.
- A secondary review is carried out at the end of the calendar to ensure the policy content is suitable and applicable. Regardless of any changes, the policy is re-signed and re-issued across the group.