

POLICY



Document control

Prepared by	Marilla King-Smith
Department	Compliance
Reviewed by	Scott Buchanan
Document Status	Revision 2
First issued	28 May 2024
Next Review Date	27 May 2025

Revision History

Revision	Date	Status	Description	Author
R01	May 2024	Draft	Initial draft for review	MKS
R02	May 2024	Released	Document reviewed and approved	MKS

[delete the following table if it is not needed]

Signed:		
Print:	Jeff Burke Joint CEO	Olly Watts Joint CEO
Date:	28/05/2024	28/05/2024

INTRODUCTION

ES Global Holdings Limited, including subsidiaries, is a global leader in relocatable architecture for major events. We are committed to ethical business practices and transparency in our supply chains, addressing and preventing modern slavery and human trafficking risks throughout our operations.

As part of our compliance with Section 54 of the Modern Slavery Act 2015 and our membership with the Gangmasters and Labour Abuse Authority (GLAA), our Modern Slavery Policy embodies robust procedures, regular audits, and a zero-tolerance approach to modern slavery.

POLICY PURPOSE AND OBJECTIVE

This policy outlines ES Global's dedication to a transparent, ethical approach to modern slavery and human trafficking in all our activities. It supports adherence to the UK Modern Slavery Act 2015 and international human rights laws while guiding operational processes and supply chain practices.

SCOPE OF THE POLICY

This policy applies to:

- **All Employees** – Required to understand, implement, and uphold ES Global's anti-slavery principles.
- **Supply Chain Partners** – Suppliers, contractors, and labour agencies are expected to meet our anti-slavery standards, comply with legal obligations, and evidence workers' rights (including the right to work in the UK, supported by CSCS cards – when available at certain site's during inductions).

KEY RISKS AND CONTROLS

ES Global recognises specific modern slavery risks within our operations and supply chain:

- **Transportation and Logistics Services** – Risk exposure includes forced labour practices in logistics and subcontracted transport.
- **Labour and Temporary Staffing** – Using local labour and temporary staffing in regions with varied labour protections may expose us to forced labour and exploitation risks.
- **Manufacturing Supply Chain** – Risks include potential forced labour in manufacturing, particularly in regions with limited oversight.

We address (controls) these risks by conducting continuous training, supplier due diligence, and implementing proactive incident reporting mechanisms, alongside regular audits to ensure compliance with ethical labour practices

GOVERNANCE AND OVERSIGHT

Our governance framework is designed to enforce strict compliance and accountability across ES Global:

- **Board of Directors** – Accountable for the oversight and annual review of this policy, led by Jeff Burke and Olly Watts.
- **HR Department** – Manages anti-slavery policy updates, coordinates training programs, and ensures policy communication across all levels of the organisation.
- **Supply Chain Team** – Responsible for assessing and managing risks within the supply chain, including implementing supplier audits and conducting risk assessments.
- **Compliance Officer** – Ensures adherence to anti-slavery measures, overseeing due diligence processes, tracking incident reports, and responding to compliance concerns.

POLICY AND PROCEDURAL MEASURES

1. **Whistleblowing Policy** – Ensures that employees and other stakeholders can confidentially report any suspected instances of unethical practices, including modern slavery, without fear of retaliation.
2. **Code of Conduct** – All employees are expected to adhere to strict ethical standards that support ES Global's anti-slavery stance.
3. **Supplier Code of Conduct and Compliance Audits** – We mandate adherence to anti-slavery principles across all suppliers, especially those in high-risk supply areas. Audits and third-party inspections (including unannounced checks) are performed where it is feasible, to assess supplier compliance.
4. **Employment and Recruitment Standards** – We exclusively use reputable employment agencies that have been vetted to ensure compliance with modern slavery standards. Our recruitment process requires workers to have individual bank accounts and supports independent financial control.
5. **Due Diligence and Self-Assessment Tools** – The Modern Slavery Assessment Tool (MSAT) translates PPN 06/20 principles to assess high-risk areas. Regular audits and self-assessments allow us to prioritise modern slavery awareness among high-risk supply chains.

TRAINING AND AWARENESS INITIATIVES

1. **Modern Slavery Awareness Training** – All employees involved in the management and procurement within our supply chain are required to complete mandatory modern slavery awareness training. This training is regularly updated to reflect best practices and any changes in legislation.
2. **Sector-Specific Training** – Employees in higher-risk regions or sectors receive focused training tailored to local conditions and risks.
3. **Awareness Campaigns and External Partnerships** – ES Global collaborates with non-governmental organisation (NGO's), including Anti-Slavery International and the Modern Slavery and Human Rights Policy and Evidence Centre, and engages in periodic campaigns to maintain modern slavery awareness among employees and suppliers.

TRAINING

Our modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

WORKER RIGHTS AND REPORTING MECHANISMS

ES Global prioritises open, accessible channels for worker feedback and grievance reporting:

1. **Anonymous Reporting Channels** – Mechanisms such as anonymous hotlines and worker surveys allow employees and suppliers to report concerns confidentially.
2. **Employee Representation and Communication** – We advocate for representation and encourage direct communication, including committee structures, for workers in call-off contracts, providing dedicated spaces for issue discussion.
3. **Feedback Mechanisms and Data Analytics** – Worker feedback is collected via surveys and grievance channels. Advanced data analytics identify risk patterns in the supply chain, allowing early intervention where concerns arise.

KEY PERFORMANCE INDICATORS (KPIs)

Our KPIs ensure effective policy implementation and continuous improvement:

1. **Audit Frequency and Compliance Rates** – 6 monthly audits of dip sampled suppliers, with corrective actions for non-compliance, are tracked and reviewed.
2. **Incident Reporting and Resolution** – Monitoring the number and type of reported incidents, aiming for swift resolution within agreed timeframes.
3. **Training Completion Rates** – 100% completion of mandatory training for all identified employees, with additional high-risk region training where necessary.

Performance is transparently reported via our annual Modern Slavery Statement on our website, which outlines progress, challenges, and areas for improvement.

CONTINUOUS IMPROVEMENT AND REVIEWS

Our policy and practices undergo regular assessments to incorporate feedback and align with evolving best practices and regulatory requirements. Regular reviews of our grievance mechanisms and worker support channels ensure their continued effectiveness and accessibility. ES Global remains committed to maintaining and advancing our robust modern slavery prevention strategies, leveraging insights from worker feedback and partnerships with NGOs.

FINAL APPROVAL AND REVIEW

This policy, approved by ES Global's Board of Directors on 24 May 2024, is reviewed annually, with updates communicated across the organisation to reinforce our commitment to a zero-tolerance approach to modern slavery and human trafficking