



Anti-Slavery & Human Trafficking Policy Statement

This statement is made in accordance with Section 54, Part 6, of the Modern Slavery Act 2015 and sets out Collins actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business or our supply chain. Collins operate a zero—tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all our business dealings.

Organisation Structure

Collins is a has been established since 1956 and our core business is the provision of refurbishment and fit out services to commercial property predominantly based in London.

Our Policies

The company operates several policies to ensure that we work in an ethical and authentic manner:

- **Supplier Policy:** We conduct due diligence checks on our new suppliers and subcontractors before trading with them.
- **Anti-Slavery Policy:** This sets out the company's position on modern slavery and human trafficking and is available to all employees.
- **Recruitment Policy:** All new employees are subject to checks to verify their eligibility to work in the UK.

Responsibility for the Policy

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all staff are compliant.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given advice, guidance and literature internally by trained personnel and sourced from UK government website on the issue of modern slavery in supply chains (<https://www.gov.uk/government/collections/modern-slavery>).

Risk Review

We have categorised four key areas where there would be a potential risk in relation to this Policy:

- **Collins employees** – All our employees are paid above the London Living wage, our staff are employed under a PAYE basis, as part of on the onboarding process passports and National Insurance cards are collated.

All our employees are required to provide evidence of their eligibility to work within the UK.

- **Sub-contractors** – The supply chain is provided with a copy of the Anti-Slavery and Human Trafficking Policy which they must adhere too, in addition to this we have a thorough vetting process and monthly quality review. We recognise the requirements of the construction act and ensure payment is made in alignment with these using on online system PAYAPS

- **Agency labour** – We work with recognised labour / recruitment agencies, they are aware they need to comply with this policy. The Agencies are required to bear the responsibility for vetting their candidates for their eligibility to work in the UK.
- **Material procurement** – Collins appreciate that the procurement of particular products and materials could pose a potential risk due to the lack of transparency in regard to the items origins. We have internal KPIs regarding responsible sourcing, however this year we are focusing on engaging with our supply chain to discuss this topic and help raise awareness.

Due diligence process

As part of our due diligence process, we require all sub-contractors to complete a pre-qualification questionnaire (PQQ). In addition to this a copy of our Anti-Slavery and Human Trafficking Policy which all trades must commit to working towards can be found on our website.

All Collins staff attend mandatory induction training which includes information on Anti-Slavery and Human Trafficking. Collins have also invested in a robust automated payment process for both our supply chain and staff.

Measuring our effectiveness

Consideration is currently being given to the key performance indicators that Collins may choose to use in tracking our progress in reducing modern slavery risks. The indicators we choose will help to deliver an increase in awareness, especially within our key supply chains and amongst site operative teams.

These key performance indicators are likely to include E-earning completion rates amongst our own employee base, the use of anti-slavery site inductions, commitments to deliver modern slavery supply chain forums and the effectiveness of our communications through the number of incidents reported.

Training and awareness

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.



Jason Warren - Managing Director
January 2022