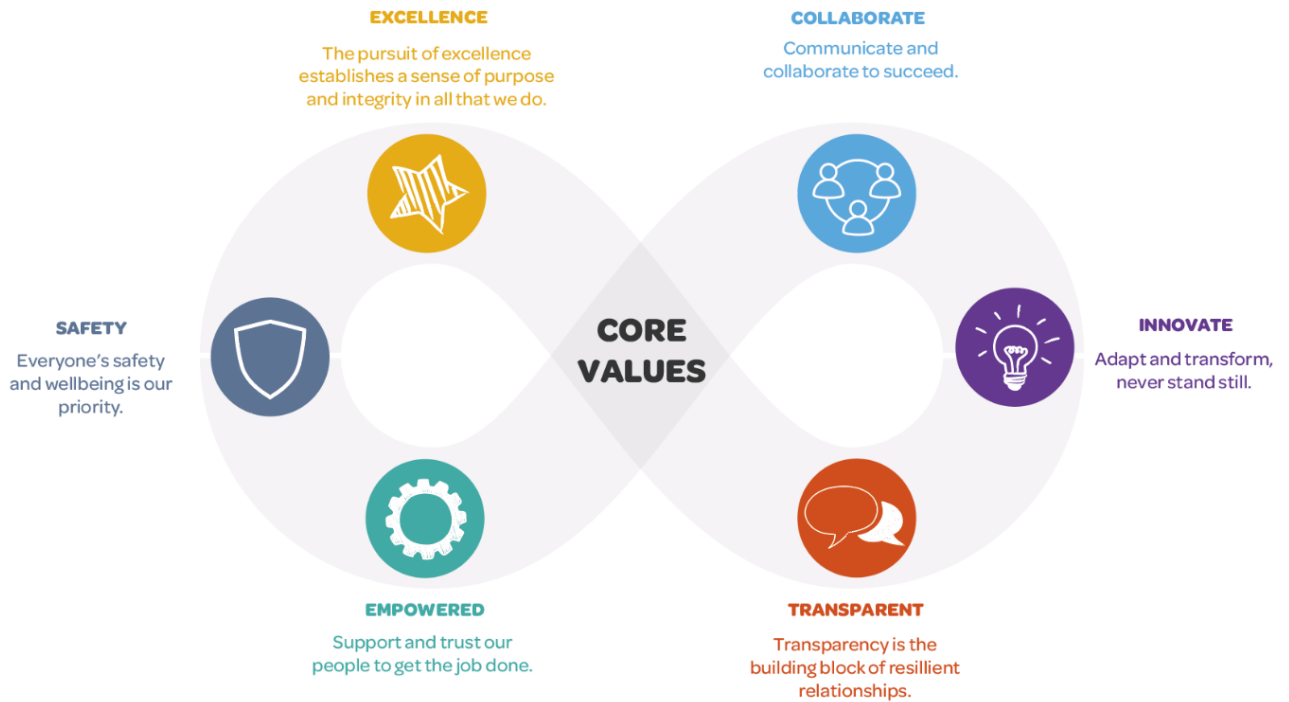




## Modern Slavery & Human Trafficking Statement

### Business Structure and Supply Chain

MSF is a UK based street furniture technology and lighting company that was established in 2011. We are committed to upholding our company values.



We strongly believe in our company values and the professionalism they convey in the modern diverse workplace. We believe in transparency and an empowered workforce that collaborates in an innovative way with all our partners to ensure excellence and safety in everything we do. These values are the pillars that we build upon to ensure we are doing our best to be an ethical corporate citizen. We currently do not fall within the reporting parameters within section 54 of the Modern Slavery Act 2015. Therefore, this statement will explain how slavery and human trafficking can affect our business and the steps we are taking in the fight against it. This document is intended to fulfil the legal requirement for a slavery and human trafficking statement for the company. Our efforts against slavery and human trafficking complement our broader CSR policy and ethical trading.

MSF is based in Podington, Northamptonshire with two other operating depots in Newton Aycliffe and Dartford. Our service utilises products from UK based low risk companies that are governed by set materials standards to be used on UK Highways (Manual of Contract Documents for Highway Works Contents). We have under 250 employees within our organisation with under 1000 approximately who are engaged through our supply chain.

We are currently not required to publish an annual slavery and human trafficking statement but feel it is in our interests to have this statement published for the betterment of the wider business CSR Commitments and to share our efforts in doing this. This past financial year ending 31<sup>st</sup> Aug 2021 we took the following steps to ensure slavery and human trafficking did not occur within our organisation.

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## Slavery and Human Trafficking policies

MSF Modern Slavery is a term which is used to encompass slavery, forced and compulsory labour and human trafficking. It applies equally to adults and children, when they are forced to work against their will and often for little pay or no pay or other basic workers' rights.

The Modern Slavery Act 2015 placed a duty on commercial organisations supplying goods and services and who operate within the United Kingdom, to ensure that their operations and supply chains are free from acts of modern slavery and human trafficking.

We have developed this policy to demonstrate our commitment to the prevention of Slavery and Human trafficking and we are updating our supplier code of conduct to reflect this.

We have set clear goals for this year and will be setting further 1-, 3-, and 5-year objectives based on current and potential risk as the company grows.

We are basing our objectives on the following themes.

**Relationships** – Strengthening our supplier onboarding and engagement process

**Feedback** – Strengthening and educating out mechanisms for individual worker feedback and whistleblowing policies

**Knowledge** – Improving our knowledge of employee and supplier issues by collecting relevant data and improving product traceability

**Third Party Engagement** – Working with current and future auditors and building relationships with auditors and clients

**Measuring Change** – Developing KPI metrics to measure our progress

**Collaboration** – Working with suppliers to collaborate on slavery and human trafficking issues

**Accountability** – Establish a framework for organisation accountability to allow for raising issues, making suggestions, voicing grievances and reporting slavery and human trafficking


## Due Diligence

MSF Ltd understand that our biggest risk of exposure to Modern Day Slavery and Human trafficking is with our supply chain. We ourselves have performed a Modern Slavery risk assessment and as a company that self-delivers 99% of our workload are comfortable that we present a low risk throughout our supply chain.

This means that we will incorporate into our due diligence, any appropriate measures to ensure that anyone we enter business with do not engage in acts that could fall within the definition of Modern Slavery and that we protect the reputation of ourselves and our clients as fair and reasonable employers. To do this we regularly, through our onboarding process, perform due diligence that our supply chain is performing their due diligence throughout their own supply chain.

Our supply chain all fall within the UK borders and are considered low risk

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## Ethical Employment

The company upholds the principal of “ethical employment” in the running of our business and the work we do, we will ensure that:

- We act with integrity and transparency.
- We provide a safe working environment.
- We promote health and wellbeing amongst employees and workers, that.
- Employment is freely chosen.
- Children and young workers are not exploited.
- Working hours for employees are not excessive.
- Employees are properly remunerated for the work they do.
- Appropriate training is provided to ensure employees can perform their job.
- No individual will suffer discrimination, harassment, or victimisation of any kind.
- We will work with employees to resolve any grievances or disputes.

As a legislative compliant company, we expect our supply chain to act in a similar manner and to provide assurance that they uphold similar principals and that we uphold the right to withdraw from agreements where no evidence is forthcoming.

## Identifying, assessing and managing risk

Within our scope of business, we set out to identify the extent of any human trafficking with our supply chain by;


- Documented supply chain onboarding reviewed biannually and vetting using SSiP companies
- Random Spot checks and audits on our supply chain working on our behalf
- Random Audits of our direct supply chain management systems
- Reviewing supplier Slavey and Human Trafficking policies and training

## Key Performance Indicators

In order to assess the effectiveness of our modern-day slavery measures we will be reviewing the following key performance indicators.

- Staff Training Levels
- Any Slavery incidents reported within the supply chain
- Right to work check discrepancies
- Audits carried out on supply chain
  - On site
  - In office

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## Training Available to staff

A key part of our slavery and human trafficking strategy is to promote cultural change through training. This financial year we will

- Make available, this policy and ensure it is included within all staff inductions
- Deliver an online training module to all staff making them aware of the issue of modern slavery

## Employees right to work in the UK

All Employees are vetted for nationality on the application and induction process whether working for or onboarding with the company must have been checked for their right to work in the UK.

The company uses the Home Office right to work checklist as described in the Home Office Right to work Checks supporting guidance dated 31<sup>st</sup> Aug 2021 ensuring we comply with the Immigration, Asylum & Nationality act 2006. Details described below.

There are two types of right to work checks: a manual document-based check and an online check.

Conducting either the manual document-based check or the online check as set out in this guidance and in the code of practice will provide you with a statutory excuse.

Use the Employer Checking Service where an individual has an outstanding application, administrative review or appeal, or if their immigration status requires verification by the Home Office, for example in the case of Crown Dependencies.

### Conducting a manual document-based right to work check

There are three steps to conducting a manual document-based right to work check. Complete all three steps before employment commences to ensure you have conducted a check in the prescribed manner, in order to meet statutory requirements.

The Steps are

OBTAIN  
CHECK  
COPY

#### Step 1: Obtain

You must obtain original documents from either List A or List B of acceptable documents at Annex A.

#### Step 2: Check

You must check that the documents are genuine and that the person presenting them is the prospective employee or employee, the rightful holder and allowed to do the type of work you are offering. You must check that:

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1. photographs and dates of birth are consistent across documents and with the person’s appearance in order to detect impersonation.
2. expiry dates for permission to be in the UK have not passed.
3. any work restrictions to determine if they are allowed to do the type of work on offer (for students who have limited permission to work during term-times, you must also obtain, copy and retain details of their academic term and vacation times covering the duration of their period of study in the UK for which they will be employed);
4. the documents are genuine, have not been tampered with and belong to the holder; And
5. the reasons for any difference in names across documents can be explained by providing evidence (e.g. original marriage certificate, divorce decree absolute, deed poll). These supporting documents must also be photocopied, and a copy retained.

**Step 3: Copy**

You must make a clear copy of each document in a format which cannot manually be altered and retain the copy securely: electronically or in hardcopy. You must also retain a secure record of the date on which you made the check. Simply writing a date on the copy document does not, in itself, confirm that this is the actual date when the check was undertaken. If you write a date on the copy document, you must also record that this is the date on which you conducted the check.

Ensure that all verified documents are retained for at least 2 years after employment has ceased

You must copy and retain copies of:

1. Passports: any page with the document expiry date, the holder’s nationality, date of birth, signature, leave expiry date, biometric details, photograph and any page containing information indicating the holder has an entitlement to enter or remain in the UK (visa or entry stamp) and undertake the work in question (the front cover no longer has to be copied).
2. All other documents: the document in full, including both sides of a Biometric Residence Permit, application Registration Card and a Residence Card (biometric format). All copies of documents taken should be kept securely for the duration of the worker’s employment and for two years afterwards. The copy must then be securely destroyed. The checklists used to ensure compliance with legislation are;
  - employers’ ‘Right to Work Checklist’ to ensure you have correctly carried out all the steps you need to; or
  - online interactive tool ‘Check if someone can work in the UK’, which will take you through the process by asking you a series of questions.


Both will help you to confirm that you have undertaken each step correctly to establish your statutory excuse.

This policy will be reviewed annually as a minimum requirement, or in the event of any significant change.

**Director and Responsible Manager**

**Shaun Stacey**

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**01/12/2021**

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Dean Powell	Leadership, Planning, Review	29/03/2022