

# Robertson: Modern Slavery Act Transparency Statement

## Introduction from the Executive Chairman

Robertson is committed to ensuring adherence to the highest legal and ethical standards. As a group, we adopt a zero tolerance approach to any criminal offence. This is reflected in every aspect of the way we operate, through our commitment to the prevention, deterrence and detection of such acts. We therefore take very seriously the effective prevention of slavery and human trafficking, and will not tolerate this in any form. As well as being illegal, slavery and human trafficking are damaging to all parties who engage in them. Any breach of our policy will be regarded as a serious matter and will result in disciplinary action.

## Organisation structure

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

## Our business

There are currently 18 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, regionally based construction companies, civil engineering, building services, and businesses that deliver high-quality homes for the private and affordable markets.

## 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.

## Our policies

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 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 Lothians Limited	SC329233
Robertson Homes Limited	SC151825
Robertson Facilities Management Limited	SC185956

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.

Our commitment to Anti-Slavery Policy is further supported by our Ethical Procurement, Equal Opportunity and Whistle-blowing policies. These core business policies enforce our commitment to acting ethically and with integrity in all business relationships through the implementation, enforcement and acceptance of set minimal trading requirements across all areas of engagement within our supply chain.

### **Due diligence and risk awareness**

Internal employees:

Adherence to 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 such criminal acts.

External supply chain:

We fully expect that our direct supply chain members 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 intend to further develop and implement the following measures:

- Further develop our supply chain prequalification process to incorporate early awareness of actions being undertaken to safeguard our requirements
- Engage with our suppliers to convey our policy requirements and gain an understanding of the measures and controls they have adopted to ensure compliance within their businesses
- Conduct a risk-based approach to the identification of areas in both our own business and wider supply chain that are most exposed to the risks associated with modern slavery, so that efforts can be focussed on those areas
- Develop contractual provisions for our suppliers to confirm their adherence to our policies while accepting our right to audit their activities and wider supply chain relationships

### **Training**

To make sure that our staff and wider supply chain have a high level of understanding of the risks associated with modern slavery and human trafficking, we are committed to providing the appropriate levels of training, and support to all staff members through our robust induction process and/or the Robertson E-learning Academy. All senior managers have been fully briefed on this matter.

## Effectiveness

To make sure that we monitor our compliance with policy, we will use the following key measures across our group of companies:

- Completion of all statutory requirements to ensure right to work within the UK
- Development of Supply Level Agreements with at-risk supply chain members and agency labour providers
- Risk-based external audit programme to measure compliance with policy requirements
- Level of personal interaction with supply chain members to gauge their understanding of and engagement with our expectations

## Declaration

This statement is made in accordance with our obligation to Section 54, Clause 5 of the Modern Slavery Act and constitutes our group's slavery and human trafficking statement for the financial year 1<sup>st</sup> April 2016 to March 31<sup>st</sup> 2017.



DEREK W. SHEWAN  
Chief Operating Officer  
Robertson Group