

Styles&Wood Modern Slavery Statement 2019

For the Extentia Group incorporating Styles&Wood, SouthernBroadstock, Keysource, GDM, Concourse, SpacInvader, iSite, Arctick and Mobias

Introduction

In 2018, the Styles&Wood Group ("Styles&Wood") was acquired by Extentia Group ("Extentia") along with the Southern Group of companies. Going forwards, all Modern Slavery Statements will be made by Extentia and will capture the anti-slavery initiatives and risk management applicable to all parts of the Extentia.

During 2018, the focus of our Modern Slavery Risk Team was on ensuring that all processes were implemented consistently across Styles&Wood Group companies – including more recently acquired companies. Following the creation of the enlarged group, the team has been working to understand the risks and existing processes within SouthernBroadstock and SpacInvader with a view to implementing group-wide processes that adequately reflect and address the modern slavery risks across the Extentia businesses.

We have always recognised that the risk of modern slavery is dynamic and ever evolving. For this reason, we have reviewed, and will continue to review regularly, our approach to assessing and mitigating the risk of modern slavery. Recent self-assessment has led us to conclude that, within the next 12 months, our processes and tools for carrying out due diligence on our supply chain require investment and update. This will address the needs of the enlarged group – which has a large and more varied supply chain – and, also, ensure that the best reporting mechanism is in place.

The investment and manpower associated with further improving due diligence reflects the importance of this issue to Extentia, together with the group's commitment to eradicating modern slavery.

We continue to work towards this goal on a consistent basis.

Management Responsibility

Our Modern Slavery Risk Team continues under the same leadership of our Head of Supply Chain. This continuity allows for continuous improvement and growth. The team remains a multi-disciplinary team comprising managers from our Human Resources; Safety, Health, Environmental and Quality (SHEQ); and Legal functions. Together, the team are working to extend the reach of the due diligence and governance across the enlarged group.

Since becoming a signatory to the GLAA Construction Protocol in 2018, representatives from the Modern Slavery Risk Team have attended a variety of functions geared towards sharing best practice. This has allowed us to bring ideas and new initiatives into our business which has, for instance, allowed us to further improve our site induction processes.

Our Head of Supply Chain also continues regularly to engage with organisations such as Stronger Together, the Chartered Institute of Procurement & Supply and BiTC in order to remain up to date with developments in the field, and the emerging thinking around risk management.

Our Business and Supply Chains

Extentia provides built environment support to a variety of sectors, including commercial, retail, banking, healthcare, education and leisure. We subcontract many trades and services to third party organisations, and source all goods and materials (whether for our clients' projects or for use by the business directly) through third party suppliers. We also have product manufacturing facilities within Extentia, through Southern's Broadstock.

Working under the guidance and governance of our SHEQ team, our site teams are responsible for ensuring that basic labour standards and welfare facilities are in place on all our sites, and within our manufacturing facilities. We also ensure that similar labour and welfare facilities are in place at our suppliers' places of work which are managed by our supply chain. We do this through planned audits. All of this is underpinned by a commitment to working in accordance with our corporate values.

Human Resource

The fluctuating demands of project-based work determine that we often need to rely on agency or temporary staff. In order to manage risk more effectively, we have recently reduced the number of appointed agencies that can provide temporary resource to Extentia. This has built upon improved risk management in several Extentia businesses, whilst transforming risk management in others. We have service level agreements in place which allow us better visibility on their methods of recruitment, together with their management of human resource. These relationships with temporary resource agencies are reviewed annually.

We also continue to undertake audits with all our temporary resource agencies. This allows us to review their processes in relation to the risks of modern slavery.

Through our subcontractor audit process, we also review the temporary resource agencies used by our subcontractors, to ensure that they adhere to minimum industry standards. In addition, we provide advice to our supply chain, to ensure that they are better informed, and capable of managing the risk of modern slavery within their own supply chains more effectively.

Policies and Contractual Controls

We have carried out a second review of all relevant policies to ensure that they remain appropriate and fit for purpose.

Styles&Wood operates a Whistleblowing Policy. Although this is aimed principally at employees, it also extends to other workers and contractors. The policy expressly includes matters associated with modern slavery. All Extentia employees have undertaken online training to raise awareness and understanding of whistleblowing and modern slavery. Annual refresher training will be delivered moving forwards, to help ensure that all employees remain vigilant and informed about the risks of modern slavery to our businesses.

Our procurement policy continues to reflect Extentia's approach to modern slavery in its supply chains, and the importance that we place upon ethical trading.

Extentia's supplier terms and conditions ensure that appropriate weight is given to prioritising ethics and eradicating modern slavery. We have also introduced a group procurement contract which we will endeavour to use whenever buying products or services for the group. This also features terms which give primacy to addressing the risk of modern slavery, and the expectations that we have of our suppliers.

We have introduced a new and updated Statement of Ethics which now features on our websites across the group. It addresses Extentia's ethical standards including its requirements regarding modern slavery.

Management of Suppliers and Supply Chain

Despite our growth as a group, our business model and the sectors in which Extentia operates has not changed significantly over the last 12 months. Taking this into account, together with the results of further internal risk assessments, we remain of the view that there is a moderate risk of modern slavery being a feature of our supply chains. Nevertheless, since we are soon to invest in new supply chain due diligence software, we intend to carry out some more detailed supply chain mapping across the Group businesses, to ensure that we are capitalising on risk management opportunities which are afforded by this new technology.

We have various mechanisms in place designed to identify and address the risk of modern slavery which now apply across the Extentia businesses:

- As our supply chain continues to grow and evolve, all subcontractors are subject to a due diligence process, which is managed through an external portal. Suppliers are required to provide information on their processes and procedures in relation to minimising the risk of modern slavery within their businesses.
- All subcontractors appointed to support Extentia operationally are assessed through a pre-qualification process which gathers information about our subcontractors' business operations prior to any orders being placed or any works commencing on site. This includes confirmation relating to employee engagement regarding health and safety issues and development of skills such as training.
- Strategic subcontractors are subject to bi-annual formal review.
- "Health Checks" are carried out regularly to ensure that every subcontractor's health and safety compliance is up to date.
- On site audits and inspections are also carried out regularly.
- Subcontractor forums and briefing sessions are carried out to raise awareness of hot topics, including modern slavery. These sessions allow us to work with our key suppliers to drive improvements in processes and procedures on site relating to worker conditions and treatment.
- Tender processes are carried out when appointing key suppliers of goods and services to the group to ensure that we are engaging with ethical and suitable contractors.

- Key suppliers are audited in line with our internal due diligence assessments including health, safety, supply chain management and employee terms and conditions. The audit specifically reviews processes in place to minimise the risk of slavery within their own business and those of their supply chain.

Modern Slavery Training and Communications

All current employees of Styles&Wood, Keysource, GDM, Concourse, iSite, Arctick and Mobias have completed an e-learning course on modern slavery to ensure that they are aware of the risks, know how to identify the signs and what to do if they suspect a risk on their sites. This training includes familiarisation with the associated policies. All new employees are required to undertake the same training as part of our induction process.

Over the next 6 months, employees across the SouthernBroadstock and SpaceInvader businesses will also complete this training.

We continue to provide information on all our sites in the form of the GLAA Workers Rights leaflets to ensure that our supplier's operatives are aware of their basic employment rights and what they need to do if they are concerned about their own situation or that of someone they work with.

Modern Slavery Response Plan

We have again reviewed the Modern Slavery Response Plan, which remains appropriate given the nature and size of our business. This details the steps and measures that the company will take in the event of discovering evidence of modern slavery within its supply chain. The plan details how we will:

- Determine the appropriate enforcement body or victim support organisation to contact
- Protect and support at risk individuals
- Report to authorities
- Capture and protect evidence

Continued Commitment

The next 12 months will see significant investment in tools to support the due diligence of our supply chain - since we recognise this as one of the key areas of risk posed to a business with a supplier base of such scale and variety.

Extentia remains committed to a 'zero tolerance' approach to modern slavery and is working to continuously improve its response to the risk that modern slavery may exist within its supply chains – however small or seemingly insignificant such a risk may be.

This statement was approved by the Board of Extentia Group Limited.



Chief Executive Officer of Extentia Group Limited