

Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

DSM Demolition Ltd has a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in all of its operations and supply chains.

We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2021.

This statement has been approved by the Board of Directors of DSM Demolition Ltd and signed by Andrew Fletcher, the Managing Director.

Our business and supply chains

DSM Demolition Limited is one of the UK's leading demolition and decommissioning companies, with an international reputation for Quality, Innovation, Health and Safety. Established in 1988, the business has built up its reputation on repeat business and strong business relationships operating across a broad range of sectors. The company offers extensive specialist services throughout the United Kingdom and Ireland to a well established and valued client base including; Local Authorities, Government Bodies, Health Trusts, Utility Companies, Developers and Main Contractors.

DSM Demolition Ltd maintains a select core of supply chain partners and their careful selection and on-going review ensures all parties are committed to challenging behaviour that does not support our respect for the law, compliance with health, safety and environmental standards and a commitment to ethical work place practices.

We have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, we would act immediately against the supplier and report it to the authorities.

Risk assessment

In the past year, we have conducted a full review of our supply chain and risk assessment taking into account:

- The business services rendered by the suppliers
- The presence of vulnerable demographic groups

Our assessment of our supply chain confirms we are relatively limited to the exposure of human trafficking. The area of greatest risk to the organisation is the recruitment of temporary labour and paying the agency not the employee.

Following our annual review DSM Demolition appointed a Slavery Compliance Officer (SCO) to whom all concerns regarding Modern Slavery should be addressed. The SCO will, amongst others, co-ordinate and follow up any investigations following a report of Modern Slavery or failure to comply with DSM's Anti Slavery protocol.

Policies

DSM Demolition Ltd operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when undertaking business on behalf of our organisation and managing our supply chain.
- Purchasing policy - we have updated our purchasing policy and supplier contracts to make explicit reference to slavery and human trafficking.
- Anti Slavery Policy – outlines the risk to the business from modern slavery and the steps it takes to ensure the organisations operations and supply chains remain free from human trafficking
- Corporate Social Responsibility – details our commitment to CSR, the principles upon which it is based and the broader community to which it applies
- Recruitment Policy – details the governance and commitment to ensuring all appointments are undertaken fairly and in accordance with equal opportunities obligations

Supplier due diligence

DSM Demolition Ltd conducts due diligence on all new suppliers and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, right to work in the UK and employee contracts
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We require all suppliers to confirm:-

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

Awareness

DSM Demolition Ltd has raised awareness of modern slavery and include modern slavery posters / communications as standard across all facilities and will again be sending an email to employees with links to Modern Slavery guidance and case studies along with a reminder of :-

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

Training

In addition to the awareness programme, DSM Demolition has reviewed training needs and will continue to provide access to the Home Office guidance and toolbox talks as part of the learning programme which will include

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps DSM Demolition will take if a supplier fails to implement anti-slavery policies or controls
- We are currently exploring various online training forums for initial roll out to key staff

Measuring how we're performing

DSM Demolition Ltd has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- How many employees have completed mandatory training?
 - To date all operational sites have had a Modern Slavery Toolbox talk briefing as part of a scheduled roll out of an introduction to Modern Slavery awareness programme.

- How many suppliers have rolled out an awareness and training programme that is equivalent to ours?
 - All suppliers operating on DSM sites at the time of the Toolbox Talk were included in the Modern Slavery presentation. An assessment of their internal training programmes is on going.
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- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?
 - We have not had any reports by employees of any modern slavery offences.

This statement covers 1 April 2021 to 31 March 2022 and will be reviewed by DSM Board of Directors.



Andrew Fletcher
Managing Director

Date: 31st March 2021