



Modern Slavery & Human Trafficking Statement

Introduction

CHAP Group is committed to acting ethically and with integrity in all our business dealings and relationships. We have a zero tolerance approach towards Modern Slavery and Human Trafficking both in our own operations and our supply chains.

This is CHAP Group's Modern Slavery and Human Trafficking statement for the financial year ending September 2018, published in compliance with the Modern Slavery Act 2015.

Organisation's Structure

CHAP Group is a Construction Group based in the North East of Scotland with approximately 210 employees. We operate through five divisions: Construction, Civils, Quarries, Homes and Developments. These are supported by a central services division.

CHAP provides a diverse range of services, primarily to clients within the North East of Scotland. These include construction (commercial and housing), civil engineering services and the provision of aggregates - sand, concrete and mortar.

Our Supply Chains

Our supply chains mainly involve the supply of suitable labour, subcontractors and the purchase of industry related materials. Whenever feasible, we use suppliers and subcontractors that are wholly based, or have a presence, in the North East of Scotland. This aids transparency and backs our ethos of local support.

Our supply chain is a fundamental part of our business operations and our success and reputation is heavily linked to their performance and ethics.

As part of our initiative to identify and mitigate risks, we are currently undertaking a review of our supply chains in order to identify and assess any risks for Modern Slavery and Human Trafficking that may be present.

Employees

We comply with all employment law requirements within the UK. We also conduct a pre-employment check to ensure that all employees have the right to work in the UK.

Sub-contractors, Agency Workers and Material Suppliers

We are committed to ensuring that sub-contractors, employment agencies which supply us with workers and material suppliers have received our Anti-Slavery policy and confirm their compliance with its terms and/or show similar or greater commitments to eliminating slavery and human trafficking in their business and own supply chain.



Our Modern Slavery and Human Trafficking Policies

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains.

Our Anti-Slavery and Human Trafficking Policy is contained within our Corporate Social Responsibility (CSR) policy and reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not present in our own business or in any area of our supply chain.

Due-Diligence

As part of our initiative to identify and mitigate risk, we undertake due diligence by requiring all our new and existing suppliers/sub-contractors to confirm their compliance with the Modern Slavery Act 2015. We expect them to show and evidence their commitments to eliminating the risk of modern slavery in their business and supply chains and to confirm their compliance with our Anti-Slavery and Human Trafficking Policy.

If suppliers/sub-contractors fail to provide evidence of their commitment to eliminating modern slavery, or fail to confirm compliance with our policy, then they will be removed from our approved suppliers list and they will not receive any further payments from CHAP Group.

We are implementing these changes into our supplier and sub-contractor process and aim to have confirmation from all suppliers of their compliance with our policy by June 2019.

Awareness Training

All existing employees have access to our Anti-Slavery policy and are invited to raise any questions or concerns that they may have.

It is in hand to have our Anti-Slavery and Human Trafficking policy incorporated into our employee induction programme and employee handbook to ensure that all new employees are aware of its importance and will be expected to sign to confirm that they have received, read and understood the policy.

Over the coming financial year we will be reviewing the need to provide wider training for all or selected employees within CHAP Group.

Our Effectiveness in Combating Slavery and Human Trafficking

The following key performance indicators (KPIs) will be used to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chain.

- We shall complete the current review of our existing supply chain by June 2019.
- We shall ensure that all new and existing suppliers have provided a copy of their Modern Slavery and Human Trafficking statement and confirmed their compliance with ours.



- We shall ensure that all new employees have been inducted on our Anti-Slavery and Human Trafficking policy and have signed to confirm their understanding.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending September 2018.

This statement was approved by the board on 29th March 2019.

Signed for, and on behalf of, the board

Shona Gee, Finance Director