

Modern Slavery and Human Trafficking Statement

Introduction

The following statement sets out the approach that Stroma Building Control takes to ensure that we are committed to ensuring that Modern Slavery and Human Trafficking do not exist in our workforce or our supply chain.

Statement of Commitment

Stroma Building Control has a zero-tolerance approach to Modern Slavery and is committed to acting ethically and with integrity in all our business dealings and relations. When tendering for future business or seeking commercial partnerships, modern slavery forms a key part of our due diligence, reviewing the policies and processes that are in place in this area, and how potential partners are auditing progress in tackling the risks of modern slavery.

This statement applies to all persons working with us or on our behalf in capacity and we reserve the right to terminate our relationship with any individuals or organisations working on our behalf if they breach this statement.

Our Organisation

Stroma Building Control is a Registered Building Control Approver (RBCA), which has a workforce of c210 employees and is approved by the Building Safety Regulator (BSR) to provide Building Control support services to both residential and commercial clients in England and Wales.

Stroma Building Control strives to set the highest possible standards, providing a consistent and clear approach to all building control projects which has positioned us as one of the leading RBCAs.

With respect to modern slavery, it is important to note that at present we do not have supply chain partnerships within our operating model. Should we consider supply chain operating models in the future, our suppliers and subcontractors would be required to comply with our existing business practices in this area.

Our Policy on Modern Slavery and Human Trafficking

Stroma Building Control ensures that all employees and agents within our supply chains are not subject to any labour exploitation, domestic servitude or sexual and criminal exploitation.

The board of directors have full responsibility for ensuring that this policy is enforced within the organisation and that each individual has a personal responsibility for the successful prevention of slavery and human trafficking. This statement is supported by our wider business policies in the following areas:

- Recruitment & Selection Policy
- Whistleblowing Policy
- Code of Conduct Policy

Due Diligence

Where Stroma Building Control has a concern with our supply chain, we may undertake discussions or use a qualifying questionnaire to allow an opportunity for vetting of activities and policies.

Employees and or supplies can use the Stroma Building Control Whistleblowing Policy to report any concerns. The online form is available on the Stroma Building Control website <u>https://stromabc.com/company/key-documents/</u>. This form can be submitted anonymously and will be treated in confidence with appropriate actions taken by Stroma Building Control.

High-Risk Areas and Factors

Stroma Building Control acknowledges that risks arising from modern slavery and human trafficking can apply anywhere within our operations and supply chain whether through the supply; however, based on our scope of work, this is considered a low risk.

We feel there is an element of risk in recruitment when using agencies and have, therefore, set up an internal process and preferred supplier list whereby nobody within the business can go to any agencies that have not been approved.

Employee Training of Modern Slavery and Human Trafficking

All Stroma Building Control employees will receive the required level of training respective to the role they undertake in the business. As a minimum, all employees will be issued with our Modern Slavery Toolbox Talk on at least an annual basis and is available via our Staff Intranet. This also forms part of the induction process for new starters.

Plan for Continual Improvement

Stroma Building Control's Modern Slavery and Human Trafficking Statement is subject to continuous monitoring and is amended as necessary. Additional policies and procedures are kept under regular review, alongside supplementary staff training.

About this Policy Statement

This statement has been reviewed by the board of directors of Stroma Building Control and approved by the Executive Director.

Mr Andrew Crooks Executive Director Stroma Building Control Ltd