

## **Introduction**

Renew Holdings plc and its subsidiary businesses are committed to the prevention of Modern Slavery and Human Trafficking and will not tolerate or condone any such identified act within any aspect of its business activities.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015, it sets out the activities undertaken by Renew Holdings plc and its subsidiary businesses in respect of the prevention of Modern Slavery and Human Trafficking and constitutes the Company's annual statement for the financial period 1<sup>st</sup> October 2016 to 30<sup>th</sup> September 2017.

## **Organisational Structure**

Renew Holdings plc, through its wholly owned subsidiary businesses, provide a diverse range of mainly engineering services supporting the maintenance and renewal of assets for both public and private sector customers in the Infrastructure Sector.

Renew Holdings plc and its subsidiary businesses operate mainly in the United Kingdom where the majority of work is delivered by a directly employed workforce all of whom are fully eligible to work within the United Kingdom.

## **Supply Chain**

Given the nature of Renew Holdings plc organisational structure and our subsidiary businesses model of directly employed work delivery utilising a UK based Supply Chain, we consider that any exposure to risk of Modern Slavery or Human Trafficking is extremely low and that should any risk exist it is most likely to be within the extended Supply Chain. Our subsidiaries work closely with their Tier 1 Supply Chain members in the identification of such risk to ensure it is addressed in an appropriate manner.

## **Modern Slavery Policy**

Our subsidiary businesses produce comprehensive policies in slavery and human trafficking which are available to view on their company websites. Links to our subsidiaries websites can be found at <http://www.renewholdings.com/contact/our-subidiaries/>. These policies and supporting procedures detail the subsidiary businesses approach to the prevention of Modern Slavery and Human Trafficking, along with the processes used to support and deliver their commitment.

Renew Holdings plc and its subsidiary businesses operate a risk based approach to the identification of Slavery and Human Trafficking the principle of which is based on the location of the product or service, industry sector, supplier relationships and existing data held supported by additional information and guidance obtained from, but not limited to, sources such as the Global Slavery Index, Corruption Perceptions Index and US Department of Labour Lists of Goods and Suppliers.

## **Due Diligence and Identification of Risk**

Renew Holdings plc and its subsidiary businesses policy of direct employment is supported by robust processes which ensure that an individual's identity is confirmed and they have a legitimate right to work in the United Kingdom. This policy and the right to work checks undertaken by our subsidiaries minimise the risk of employing forced labour or those who may be subject to human trafficking.

Where subsidiary businesses of Renew Holdings plc utilise labour only sub-contractors the introduction of due diligence checks ensure that, as a minimum, labour providers comply with our

commitment to the Prevention of Modern Slavery and their processes for recruitment contain no illegal labour practices.

**Our activities 2016/17**

Our subsidiary businesses continually review their processes and procedures to ensure that modern slavery and human trafficking is not taking place. Examples of process improvements during the year include a programme of desktop audits to identify key, high-risk suppliers. Modern slavery requirements were also incorporated into the 3-year supplier review and vendor assessment process for new suppliers.

Our subsidiaries continue to engage with industry bodies and suppliers across the markets in which they operate to better understand capability and best practice which in turn helps drive continuous improvement in their approach to modern slavery.

**Our commitment**

Renew Holdings plc and its subsidiaries commitment to the prevention of Modern Slavery and Human Trafficking emanates directly from Renew's Board of Directors.

We acknowledge that we are in the early stages of what is an ongoing process and our approach to the Prevention of Modern Slavery and Human Trafficking will continue to evolve year on year. We will utilise our annual statements to reaffirm our continued commitment to deal with this socially important issue.



**Paul Scott**  
**Chief Executive**  
Renew Holdings plc  
28<sup>th</sup> August 2018