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## Modern Slavery Statement

### ORGANISATION

This statement applies to Stef & Philips Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2019-2020.

### ORGANISATIONAL STRUCTURE

Stef & Philips Ltd are a family run business, controlled by a board of directors. The head office is located in North London, with a satellite office in Essex and multiple sites across the United Kingdom.

The main activity carried out by the Organisation is a leading provider of accommodation services for councils, housing associations, and charities. The labour supplied to the Organisation in pursuance of its operation is carried out in various sites and locations within the United Kingdom,

### DEFINITIONS

The Organisation considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement.

### COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

### RESPONSIBILITIES

- It is the responsibility of the HR Manager to ensure that all Foreign Nationals who are engaged by the Company are within the UK legally and they have a legal right to work.
- It is the responsibility of the Directors that the supply chain complying with the requirements of Modern Slavery Act 2015 in all manners.
- It is the requirement of all Directors that compliance with the Modern Slavery Act 2015 is reported to the Board of Directors.

### REPORTING OF INCIDENTS

- It is the requirement of all Directors that any non-compliance with the Modern Slavery Act 2015 report this to the Board of Directors.
- It is also the requirement of all Directors to report to the Police if they believe that a crime has been committed in relation to the Modern Slavery Act 2015.

### SUPPLY CHAINS

- The Organisation will work with our suppliers and Clients to ensure that we all the requirements of the Act are complied with.
- The Organisation will ensure that our supply chain is transparent in their obligations to the Modern Slavery Act and that we have confidence in those goods and services being provided by workers who do so at their own free will.

### INTEGRITY

- The Organisation is committed to comply with the requirements of the Modern Slavery Act 2015.
- The Organisation is committed to ensure that there is no slavery or human trafficking occurring within the organisation or its supply chains.
- The Organisation is committed to ensuring that Risk Assessments are carried out to determine any risks to the Company and to identify any external risks from our suppliers or Clients.



## TRAINING

- The Organisation will ensure that suitable and sufficient training about slavery and human trafficking is given to the Responsible employees and that refresher training is given each 12 months.
- The Organisation will ensure that any employees are given an overview of the Modern Slavery Act and issued with a copy of this Statement of Intent.
- The Organisation will ensure that if requested, in writing, that a copy of the company's Modern Slavery Act Statement of Intent is issued to them within 30 days of the request.

## IMPACT OF COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Organisation welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

The Organisation concludes that the COVID-19 pandemic did/did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above.

During the pandemic, the Organisation's employees still had access to the grievance procedure to raise any concerns that they may have had. Accompanying this is our Whistleblowing Policy which provides a system for our employees to escalate slavery and human trafficking issues and breaches of our policies. Both policies are reviewed annually

In line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

## STEPS

The Company recognises the important role it has to play for the achievement of a more sustainable future and will implement this Modern Slavery Act Statement of Intent as an element within our overall sustainability strategy.

Stef & Philips is fully committed to ensuring compliance both with the letter and spirit of the principles in the Modern Slavery Policy. For that reason, Mrs Aruna Tak has been appointed by Stef & Philips Ltd with the responsibility and authority to oversee and drive our Modern Slavery Policy.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- Measures in place to identify and assess the potential risks in its supply chains
- Undertaking impact assessments of its services upon potential instances of slavery

## KEY PERFORMANCE INDICATORS

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

TRAINING To ensure a high level of understanding of the risks of modern slavery and human trafficking in our organisation, in our supply chains and in our business partners, we provide relevant in-house training to our colleagues. Under our Supplier Code of Conduct we also require our business partners to provide regular and relevant training to their staff and suppliers and providers.

## POLICIES

The Organisation has the following policies which further define its stance on modern slavery:

- A corporate social responsibility policy
- Code of conduct



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#### **SLAVERY COMPLIANCE OFFICER**

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year and was approved by the Board of Directors of Stef & Philips Limited on 1<sup>st</sup> June 2021.

Signed by Christakis Philippou (CEO)