

PORTAKABIN LIMITED, SLAVERY AND HUMAN TRAFFICKING STATEMENT 2020

INTRODUCTION FROM THE CHIEF EXECUTIVE

In line with our commitment to operate ethically and in compliance with all relevant laws and regulations, we continually strive to improve our practices to combat slavery and human trafficking.

This statement describes the positive steps we have taken and are continuing to take to ensure that slavery and human trafficking does not take place within our supply chain or any part of our business

ORGANISATION'S STRUCTURE

Portakabin is a European manufacturer of portable and modular building solutions. We are a part of the Shepherd Building Group Limited (Company Number: 653663) which is also our ultimate parent company.

Portakabin has its head office in the UK. Portakabin has more than 1750 employees and operates in ten countries: England, Scotland, Wales, N. Ireland, Ireland, France, Belgium, Germany, Luxembourg and the Netherlands. Portakabin has a global annual turnover in excess of £315m. Further details about Portakabin can be found at www.portakabin.com.

OUR BUSINESS

Portakabin provides portable and modular buildings for sale and hire, and offsite manufactured permanent buildings for sale for temporary, semi-permanent and permanent use across a range of sectors and for a variety of applications, from offices, nurseries and classrooms to hospital wards, call centres and laboratories. Portakabin has its head office in York and operates its business from a network of hire centres.

OUR SUPPLY CHAINS

Our supply chains are responsible for sourcing and purchasing a wide range of materials and the provision of a variety of subcontractor services. Materials include items such as steel, timber and bulk chemicals for our manufacturing process and others such as furniture, electrical, ironmongery and windows for our assembly and fit-out of finished units.

The provision of subcontractor services for delivery and installation includes roofing, cladding, flooring, groundworks, plumbing and mechanical and electrical. As well as on site subcontractor services include catering, cleaning, consultants, IT, and telecoms support services.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This stance is in line with our Business Ethics policy.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we pursue an approach of continual improvement to strengthen the mitigation of risk of slavery and human trafficking. We have processes to ensure that suppliers and subcontractors are engaged via a controlled process and are subject to approval by experienced, qualified and knowledgeable procurement professionals in our central procurement function before they are contracted to supply materials or provide sub-contract services.

Our engagement process clearly sets out the standards and expectations that we require all of our supply chain partners to achieve with regards to slavery and human trafficking. Suppliers are asked to sign a Supplier Code of Conduct.

We have processes that enable us to (where possible) identify and mitigate any potential risks within the supply chain. These processes are under constant review to maintain their effectiveness.

We have systems in place to protect whistle blowers. We continue to hold Achilles accreditation.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we require our suppliers and subcontractors to adhere to our Supplier Code of Conduct. All suppliers are asked to return a written declaration to confirm their compliance with the Modern Slavery Act 2015.

In addition, Portakabin has recently undertaken a review of its contracting processes and during 2021 will look to further update our contractual terms, which currently include a commitment to not use slave labour or participate in human trafficking.

TRAINING AND AWARENESS

The business made the decision during 2019 to reconsider its approach to how it engaged with colleagues to ensure they have the awareness of issues relating to modern slavery and human trafficking (alongside other matters of legal and regulatory compliance) relevant and appropriate to their role within the organisation.

An eLearning module has been made available to help colleagues attain the requisite level of understanding of the risks of modern slavery and human trafficking. This module makes clear how we all have a part to play in ensuring that modern slavery and human trafficking does not take place in our business or our supply chain.

Communications have been made to all employees to provide a high level overview of the meaning of Modern Slavery and Human Trafficking and of Portakabin's stance of zero tolerance in regard to this matter.

"Learning to Lead in Portakabin", a 1 day introduction to leadership which covers our Business Responsibility commitment to our Customers and Partners continues to be delivered and is mandatory for all new line managers. This includes our desire to achieve a transparent and ethical supply chain and zero slavery.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We have brought this statement to the attention of those in our procurement & purchasing functions and given the opportunity to provide feedback, to raise queries and to have them answered.

Our central procurement team is currently carrying out an assessment of the risk of non-compliance in our supply chain. The team is also discussing with the Quality function how we can update and improve the supplier auditing process to ensure compliance to the standards agreed. We require our suppliers to adhere to our policies (including Business Ethics Policy, Anti-Bribery and Corruption Policy, and Equal Opportunity and Diversity Policy) and seek express acknowledgement of this through our Supplier Code of Conduct.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking in our supply chains:

- Having developed a Supplier Code of Conduct which requires compliance from all of our suppliers our focus now switches to measuring the effectiveness;
- We will be refreshing and recommunicating our Responsible Business Approach reemphasising a zero tolerance approach to slavery in our supply chain and our business as a whole;
- We will require appropriate employees to complete training to understand the risks of modern slavery and human trafficking;
- In 2020 we plan to launch a competency matrix which will provide clear direction of mandatory training within the business. This will include Modern Slavery awareness; and
- we will continue to communicate and cascade information on modern slavery across the business in order to raise awareness.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2019.

This statement was approved by the Board of Directors of Portakabin Limited on 16 June 2020.

Derek Carter

Chief Executive

For and on behalf of Portakabin Limited