
PORTAKABIN LIMITED SLAVERY AND HUMAN TRAFFICKING STATEMENT 2021

The Portakabin logo consists of the word "Portakabin" in a white, sans-serif font, set against a red rectangular background.

1. INTRODUCTION FROM THE CHIEF EXECUTIVE

We are fully committed to operate with integrity, honesty and ethics and in compliance with all relevant laws and regulations, including playing our part in eradicating modern slavery and human trafficking.

The UK Modern Slavery Act 2015 (the “Act”) requires certain businesses to state the actions that they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains.

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 for the financial year ended 31 December 2020 and is made in accordance with Section 54, Part 6 of the Act (2015).

We recognise and understand our responsibility to manage and seek to prevent, the risks of human trafficking, forced, bonded and child labour and to respect human rights in our operations and our supply chain. Our commitment to our stakeholders is clear – we will always treat people in our business and supply chain fairly and with respect. We continuously review and improve our practices to ensure that we have effective responses to prevent and remediate any negative impact on human rights.

2. WHAT WE DO

ORGANISATION 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. It has over 1,850 employees and operates in ten countries: England, Scotland, Wales, Northern Ireland, Republic of Ireland, France, Belgium, Germany, Luxembourg and the Netherlands. Portakabin has a global annual turnover of c£340m. Further details about Portakabin can be found at www.portakabin.com.

OUR BUSINESS

Portakabin is a market leader in the design, manufacture and installation of modular and portable buildings, and a pioneer of advanced modular construction. Portakabin innovates, develops and delivers exceptional modular buildings across every sector. From portable cabins for construction sites to spacious offices, from stand-alone single buildings, laboratories and dressing rooms right through to award-winning modular buildings such as ultra-modern hospitals and schools. With a promise to always deliver on time and on budget Portakabin can deliver buildings up to 70% faster than traditional construction. Portakabin has its international head office in York and operates its business from a network of hire centres and depots across Europe.

OUR PURPOSE

Our purpose is to bring modular building solutions to the market while enhancing the communities in which the buildings are placed, the lives of those living in the communities, the sustainability of our offering and enhancing shareholder value.

OUR SUPPLY CHAIN

The supply chain involved in the design, manufacture and installation of modular and portable buildings is complex and involves multiple levels. We use our Tier 1 direct suppliers to manage the risks of modern slavery throughout the entire supply chain and clearly communicate the expectations and requirements Portakabin have down through the supply chain.

We have a substantial number of suppliers supporting our business operations, covering all aspects of manufacturing, site services, corporate services and subcontracted fit out and installation of our modular buildings. Portakabin operates a global sourcing strategy for components and raw materials, however most of our suppliers are based in the United Kingdom and Europe.

3. OUR POLICIES AND GOVERNANCE

POLICIES

We are committed to ensuring 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.

Our employee Code of Conduct (launched during 2021) summarises the principles we rely on to carry out our day-to-day activities and these are also reflected in our Business Ethics policy and related policies.

GOVERNANCE

We have a clear governance process for dealing with modern slavery and human trafficking challenges in our operations and supply chains. Our corporate purpose and strategy are set by the Board of Portakabin Limited. The Board monitors performance against our strategy, including reviewing the risks and opportunities associated with our sustainability strategy and corporate purpose.

4. ASSESSING, MANAGING AND MITIGATING RISK

We are aware there may be the risk of modern slavery or human trafficking within supply chains. To seek to mitigate and eliminate this risk we take the following actions.

SUPPLIER ADHERENCE TO OUR VALUES

The selection and onboarding of suppliers is undertaken centrally or at local level as appropriate. Before any Portakabin supplier is appointed, a comprehensive review is undertaken of their commercial, financial and reputational standing.

CONTRACTUAL CONTROLS

Our standard Terms and Conditions of Purchase are being updated to include dedicated modern slavery and labour law compliance clauses, which contractually oblige our suppliers to ensure modern slavery is not occurring in their business. These clauses also oblige them to implement due diligence procedures for their own suppliers to ensure that no modern slavery is taking place further down the supply chain.

DUE DILIGENCE PROCESSES FOR MODERN SLAVERY

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

OTHER CONTROLS

Portakabin provides a confidential and independent whistleblowing hotline service which is available to all employees, so they can raise any concerns about how the company conducts its business. The service is provided by an independent third party, with suitably experienced and senior members of the organisation carrying out a full investigation of all matters raised, including reporting back to those who have raised concerns.

Evaluation of the effectiveness of controls within the business to mitigate the risks associated with compliance with laws and regulations is undertaken on a regular basis by the Internal Audit function and reports on such controls provided to the Shepherd Building Group Limited Audit Committee.

5. TRAINING AND AWARENESS

We recognise that to be effective at preventing and tackling modern slavery we need to raise and maintain awareness of this issue and the associated risks.

Although the COVID-19 pandemic reduced our ability to visit sites and for colleagues to engage face-to-face, we sought to ensure that training and awareness on ethical principles remained at the heart of both our employee onboarding experience and day-to-day activities. To this end, 2020 saw Portakabin launch its "Social Onboarding" process which provides all new starters with information and policy detail on a number of subjects including modern slavery and human trafficking and mandates completion of eLearning modules on this subject. 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.

All colleagues receive communications which provide them with a high-level overview of what is meant by modern slavery and human trafficking, the methods by which Portakabin looks to combat it and to reiterate that the company's stance is of zero tolerance in regard to this matter.

As noted above, COVID-19 had an impact on our plans to deliver face-to-face learning and knowledge sharing within our business, this included "Learning to Lead in Portakabin". This is a one-day introduction to leadership which covers how our Business Responsibility commitment to our customers and partners continues to be delivered and is mandatory for all new Line Managers. The course details our desire to achieve a transparent and ethical supply chain and zero slavery. Alternative methods of training and communication were (and continue to be) used to deliver messages about our corporate ethical stance.

6. OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

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

Our central procurement team are currently carrying out an assessment of the risk of non-compliance in our supply chain. They are 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.

To highlight the importance placed on this matter to all stakeholders, the Board of Directors of Portakabin Limited made the decision to sign up to the modern slavery registry that was launched by the UK Government in 2020.

Our filings on this registry can be found here:

[Modern slavery statement registry - GOV.UK \(modern-slavery-statement-registry.service.gov.uk\)](https://www.gov.uk/modern-slavery-statement-registry.service.gov.uk)

Whilst our plans for 2020 were impacted by the COVID-19 pandemic, we chose to focus on developing awareness of this important issue as outlined in section 5 above as well as further developing our methodology for assessing risks in the supply chain.

7. PLANS FOR 2021 AND BEYOND

Following a review of the effectiveness of the steps we have taken to ensure there is no modern slavery or human trafficking in our supply chains we intend to take the following further steps to combat it. These steps form part of our wider strategy on ESG matters:

- Having developed a Supplier Code of Conduct which requires compliance from all our suppliers, our focus now switches to measuring the effectiveness of our suppliers own due diligence procedures to ensure that no modern slavery is taking place further down the supply chain.
- 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 continue to work with our risk team to understand what competencies, legal and mandatory training requirements are required for each role in our business so as to implement a competency matrix through late 2021 and early 2022. This matrix will then be used to ensure that all those roles where there is a requirement for an enhanced understanding of matters such as modern slavery and human trafficking receive the appropriate level of training and knowledge on such matters. This being over and above the knowledge all employees will receive. The matrix will also define the requirements about frequency of refresher training and the keeping of records to evidence completion of training
- We will launch our Code of Conduct, which will bring together summarises the principles we rely on to carry out our day-to-day activities and which are also reflected in our Business Ethics policy and related policies
- We will continue to communicate and cascade information on modern slavery across the business 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 2020.

This statement was approved by the board on 14 June 2021.



Derek Carter

Chief Executive

Portakabin Limited