

PORTAKABIN LIMITED SLAVERY AND HUMAN TRAFFICKING STATEMENT 2018

INTRODUCTION FROM THE CHIEF EXECUTIVE

In line with our commitment to operate ethically and in compliance with all relevant laws and regulations, we are continuing to improve our practices to combat slavery and human trafficking in our supply chain by working with both our suppliers and employees. 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.

ORGANISATION'S STRUCTURE

Portakabin is a European manufacturer of portable and modular building solutions. We are a part of the Shepherd Building Group who is also our ultimate parent company. Portakabin has its head office in the UK. Portakabin has over 1750 employees and operates in seven countries including the UK, Ireland, France, Belgium, Germany, Luxembourg and Holland. Portakabin has a global annual turnover in excess of £280m. Further details about Portakabin can be found at <http://www.portakabin.co.uk/aboutus.html>

OUR BUSINESS

Portakabin provides portable and modular buildings for sale and hire, and off-site 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's head office is based in York and its business is operated from a network of hire centres.

OUR SUPPLY CHAINS

Our supply chains include the sourcing of raw materials and the provision of a variety of subcontractor services. Raw materials include steel, furniture, electrical, insulation, ironmongery, timber, bulk chemicals and windows. The provision of subcontractor services for delivery and installation includes roofing, cladding, flooring, groundworks, plumbing, and mechanical and electrical. Additional indirect 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 as reflected in our Business Ethics policy.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we are continuing to implement measures to ensure that suppliers and subcontractors are subject to an approval process. This approval process will incorporate questions relating to slavery and human trafficking.

In addition to this, we will continue to carry out risk assessments each financial year to identify the most at risk suppliers and subcontractors.

We will have systems in place to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- Monitor potential risk areas in our supply chains.

We have systems in place to protect whistle blowers. We achieved Achilles accreditation on 26 July 2017 for which the audit scope included slavery and human trafficking.

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 own policies. We have obtained a written declaration from our key and high risk suppliers to confirm their compliance with the Modern Slavery Act 2015.

In addition, we have recently undertaken a review and are in the process of updating our supplier terms and conditions, which include a commitment to not use slave labour or participate in human trafficking.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are in the process of developing training for our employees with direct responsibility for our supply chain and we are continuing to raise awareness of modern slavery across the business.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We have brought this statement to the attention of those in our procurement function and given the opportunity to provide feedback, to raise queries and to have them answered. Our procurement team undertook an assessment of the risk of non-compliance in our supply chain by contacting our high risk suppliers and those with the greatest spend, and required each supplier to sign a declaration of their compliance with the Modern Slavery Act 2015. 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 onboarding process.

FURTHER STEPS

Following a review of the effectiveness of the actions 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:

- we intend to review and, to the extent necessary based on legal advice, update our contracting processes to ensure that our suppliers are bound to comply with our policy against slavery and human trafficking, and include the ability to terminate relationships for any non-compliance;
- we will develop a Supplier Code of Conduct which will require compliance from all of our suppliers;
- we will be issuing a Responsible Business Approach which includes a zero tolerance of slavery in our supply chain;
- we will require appropriate employees to complete training to understand the risks of modern slavery and human trafficking; 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 2017.

This statement was approved by the board on 18 June 2018.

A handwritten signature in black ink, appearing to read "D. Carter".

Derek Carter

Chief Executive
Portakabin Limited