

## Modern Slavery & Human Trafficking Statement - 3233



### UNITED LIVING GROUP'S STATEMENT ON MODERN SLAVERY 2021

United Living Group is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on both itself and its supply chain. United Living Group takes a zero-tolerance approach to slavery and human trafficking and we expect our supply chains to take the same stance. We are committed to developing and maintaining effective systems and controls to ensure that we address the threat of modern slavery within our business and in all our business relationships, in particular in our supply chains.

#### 1. STRUCTURE OF THE ORGANISATION

United Living Group provides planned maintenance and new build services to clients across the country through its locally placed delivery units. With a passion to deliver a sustainable legacy, we work with registered provider partners, local authorities and private developers to deliver not just high-quality homes but wider benefits including training, local employment and community initiatives. Our commitment to the local community goes beyond the physical work we undertake. Our simple aim is to create a lasting legacy, supporting the sustainable growth of local people and business via our delivery approach.

Our values are our foundation:

- **Partnership delivery** – our relationships with all stakeholders are based upon integrity, transparency, trust and respect with effective teamwork and collaboration;
- **Professional and passionate** – our desire is to deliver on our commitments every time, with innovation and enthusiasm;
- **Customer focused** – we seek to work with our clients to deliver success, both in the present and the future;
- **Responsible** – sustainability is our responsibility. We are accountable for the wellbeing and safety of all stakeholders and for high quality levels of service and delivery; and
- **Community engagement** – we take pride in making a positive contribution to the communities and environment in which we work.

We deliver our projects through partnerships with our supply chain including sub-contractors, suppliers of labour and temporary labour, and general central office suppliers (including utilities and professional advisory services).

#### 2. POLICY

As part of our commitment to combating modern slavery, we have implemented a Modern Slavery and Human Trafficking policy. We also make sure that all members of our supply chains are aware of our policy and adhere to the same high standards, including by conducting their own due diligence on their own supply chains.

#### 3. DUE DILIGENCE

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:

- Pre-Qualification – we prequalify all suppliers and sub-contractors to ensure they meet our minimum standards for entry to our approved supply chain. Our prequalification process for sub-contractors is aligned to Constructionline, the Common Assessment Standard and Safety Schemes in Procurement (SSIP).
- We measure the performance and monitor all our sub-contractors monthly, using information available to stakeholders at any point in time via our databases. Additionally, we issue formalised reports to the wider business bi-monthly – using information and data to strategically identify negative and positive performance trends that may be indicators for closer inspection and audit, for which we hold contractual right.
- Any sub-contractors that we have not worked with for greater than two years, are categorised accordingly and must be reapproved prior to use.
- Preferred Suppliers and Manufacturers are procured strategically, and only achieve preferred status following a strategic procurement process that establishes them as best value. This process also incorporates our expectations and minimum trading standards associated with Modern Slavery. We have a zero-tolerance approach to modern slavery and human trafficking, and this part of our strategic procurement process is pass/fail accordingly.
- All Labour Agencies are signed to our terms and conditions and agencies are only permitted to supply to United Living Group following our risk assessment of modern slavery and human trafficking which is pass/fail. All Agencies are subject to ongoing audits in this regard.
- When we enter into a contract or framework agreement with any third-party supplier, manufacturer, agency or sub-contractor, our minimum standards form part of our contract terms and conditions which must be accepted without amendment.
- All of our sub-contractors generally have access to our agreed manufacturer and supplier procurement agreements, providing opportunity to access enhanced price terms and responsibly sourced materials
- We support the Supply Chain Sustainability School, this helps suppliers and sub-contractors develop their skills and understanding of many subject matters, including modern slavery.
- Our Procurement is aligned to our Sustainable and Ethical Procurement Policy, which ensures that:
  - Materials are procured/sourced from legal and sustainable sources and hold the necessary chain of custodies and accreditations.
  - We proactively search for sustainable products and services.
  - Continually develop our processes enabling small and medium sized local and regional businesses (SME's) to continue to thrive in our supply chain.
  - We are ethical in our business processes and culture when dealing with our supply chain.
  - We are transparent with our procurement activities and ensure that we are aligned to our Anti-Bribery and Anti-Corruption Policy.
  - We undertake training to develop and increase knowledge and understanding.
  - We minimise our dependence on the use of energy and natural resources.
  - We dispose of goods and waste in environmentally responsible ways including but not limited to reducing, reusing, and recycling as sustainable solutions.
  - We work with our supply chain to improve safety and reduce incidents across all relative areas of our business in accordance with other group Policies.

- We ensure that fair prices and terms are applied and respected and that ethical, human rights and labour standards are met in accordance with our Modern Slavery & Human Trafficking Policy.

Our due diligence procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains;
- monitor potential risk areas in our business and supply chains;
- reduce the risk of slavery and human trafficking occurring in our business and supply chains; and
- provide adequate protection for whistle-blowers.

#### **4. RISK AND COMPLIANCE**

We recognise that construction is deemed to be a high-risk sector for modern slavery and human trafficking and that risks exist in procurement processes (for works, services and goods/materials), recruitment practices and site management. Projects often include a large number of contractors, including lower skilled trades which increases the potential risk of labour exploitation.

##### **Building Materials**

We rarely procure materials directly from overseas and in any instances that we do, we assess risks associated to modern slavery, largely procuring our materials directly from UK suppliers who have their own Modern Slavery policies and/or are aligned to our terms and conditions under contract. We focus time and spend into these strategically sourced relationships.

##### **Unskilled Labour Supply**

All of the unskilled labour that United Living Group sources via agencies is 100% supplied from agencies who have successfully completed our modern slavery risk assessment and are bound by the terms and conditions of our Temporary Worker Agency contract. Additionally, we audit these agencies to ensure modern slavery risks are continually monitored and mitigated.

##### **Whistleblowing**

We have clear process and policies associated to whistleblowing that give adequate protection to any person or organisation that wishes to express concerns associated with modern slavery and human trafficking.

We require that all those in our supply chain comply with our values and we ensure that they adhere to our Modern Slavery policy. We enforce a strict code of compliance and do not tolerate slavery or human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policies we will immediately seek to terminate our relationship with the relevant supply chain member. All members of our supply chains are required to notify us as soon as they become aware of any instance of modern slavery or human trafficking taking place within any part of their business or in their supply chain.

Appropriate action is taken to investigate any breach of our Modern Slavery and Human Trafficking policy.

#### **5. TRAINING**

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of the organisations modern slavery and human trafficking policy.

Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

#### **6. SIGN-OFF**

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and is a consolidated report on the policies and activities of the United Living Group of companies and the Fastflow Group of companies, now all trading under the brand of United Living Group to ensure that slavery and human trafficking is not present in their business or supply chains. Details of the Group's main entities are set out in the Appendix at the end of this Statement. It has been approved by the Board of Directors as at the date of this Statement. The financial year end for the United Living Group of companies is 31 March.

A handwritten signature in black ink, appearing to read "Neil Armstrong".

**Neil Armstrong**  
CHIEF EXECUTIVE OFFICER  
United Living Group Limited

## APPENDIX

### List of Group Companies

1. **United Living Group Limited** a company registered in England with company number 09187624.
2. **United Living (North) Limited** a company registered in England with company number 00545646.
3. **United Living (South) Limited** a company registered in England with company number 00817560.
4. **Fastflow Group Limited** a company registered in England with company number 05114630.
5. **Fastflow Holdings Limited** a company registered in England with company number 10523632.
6. **Fastflow Investment Limited** a company registered in England with company number 10523717.
7. **Fastflow Pipeline Services Limited** a company registered in England with company number 02673066.
8. **Fastflow Energy Services Limited** a company registered in England with company number 8086718.
9. **United Living Property Services Limited** a company registered in England with company number 01990656.
10. **Oxford Manpower Limited** a company registered in England with company number 08911962.
11. **Partner Group UK Limited** a company registered in England with company number 07526123.
12. **Partner Construction Limited** a company registered in England with company number 07410551.