



Kensa Contracting

A KENSA GROUP COMPANY

# MODERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

## Introduction

Established in 2012, Kensa Contracting Ltd is renowned for our innovative Shared Ground Array heating systems deployed in social housing retrofit, social and private new build housing developments and non-domestic retrofit and new build projects. We have delivered an extensive portfolio of projects across England, Scotland and Wales with offices in Truro, Exeter and Bradford. Our staff are based all over the UK and each site we manage has a dedicated project management team.

Kensa Contracting Ltd complies with all relevant employment law legislation and we expect all our supply chain partners and clients to do the same.

## Policy Statement

We recognise that modern slavery is a significant global human rights issue. This statement sets out the actions and mitigation measures we have taken and are continuing to take to ensure no form of modern slavery or human trafficking is present within our business or our supply chain.

We accept our responsibility through due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for Kensa Contracting Ltd or on the company's behalf in any capacity, including employees, directors, agency workers, contractors, consultants and business partners.

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

We are fully committed to acting ethically and will terminate our relationship with any supply chain partner if they breach this policy and/or are found to have been involved in modern slavery.

## Other Policies

We operate a suite of internal policies to ensure that we are conducting business in a fair, ethical and transparent manner. These include:

- Anti-Bribery Policy;
- Code of Conduct Policy;
- Equal Opportunity, Dignity and Diversity Policy;
- Whistleblowing Policy.

## Due Diligence

We recognise that working as part of the construction industry, our key risks lie within our supply chain. Our supply chain includes companies who supply materials and products, specialist trade contractors and professional organisations who provide a range of consultancy services. To mitigate this risk, we operate an approved supplier list and conduct the relevant due diligence on all companies prior to them becoming approved.

Our approval process requires our supply chain partners to have either completed our pre-qualification questionnaire or to have gained SMAS Worksafe SSIP and PQQ (PAS 21) accreditation. The route to approval is determined following a risk-based approach and both pathways require demonstration of adherence to the Modern Slavery Act 2015.

High risk suppliers are also required to confirm adherence to the Modern Slavery Act 2015 as part of each contractual agreement.

Our internal recruitment processes are transparent and confirm an individual's Right to Work provisions. All employees are paid directly into an appropriate personal bank account.

## Training & Awareness

All new starters to the business are required to read and sign adherence to this and other policies. These policies are then re-signed at regular intervals or following any significant change. All staff complete an e-learning training module on this subject which includes a test at the end, requiring a minimum score of 75% to pass. This module and testing is repeated every two years and forms part of the induction training programme for every new starter.

### Further Objectives

This section provides an overview of our objectives in respect to Modern Slavery for the coming year:

- Creation of a reporting procedure so any suspected occurrences of modern slavery or human trafficking are investigated and reported to a relevant authority.
- Implementation of supply chain Risk Assessments, where appropriate.
- We have already registered with Stronger Together to utilise the resources available to enable us to conduct toolbox talks with contractors and provide onsite signage and information.
- Update our supply chain onboarding processes and documentation to include further due diligence.

### Declaration and Sign-Off

This statement has been approved by the board of directors and is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Kensa Contracting Ltd.’s Modern Slavery and Human Trafficking Statement for the financial year ending 30<sup>th</sup> April 2023.

Signed: 

Date: 31st October 2023

Mr David Broom, Managing Director,  
Kensa Contracting Ltd

Review Date: 31st October 2024

### Revision Status

Revision	Date Issued	Approved by	Signature
1.0	30/07/2019	Managing Director	
1.1	23/10/2020	Managing Director	
1.2	02/11/2021	Managing Director	
2.0	25/04/2022	Managing Director	
3.0	03/04/2023	Managing Director	
4.0	31/10/2023	Managing Director	

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The next review is due: 31/10/2024