

Modern Slavery Policy

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Modern Slavery Policy

Introduction

Modern Slavery is a hidden crime that affects over 50 million victims globally. The term covers several crimes including Sexual Exploitation, Forced Marriage, Criminal Exploitation, Domestic Servitude and Labour Exploitation. Through the introduction of the Modern Slavery Act 2015 businesses are required to understand the impact they have on the potential for modern slavery and make efforts to address the issue where they can. This includes considering the impact we have on supply chain activity and the potential for exploitation within.

This policy outlines Action Sustainability's commitment to address modern slavery issues, both through our organisational activities and our supply chain commitments.

Ethical business is at the heart of what Action Sustainability believes in and we are committed to acting with integrity in all our business activities and relationships.

We are committed to preventing, identifying, managing and mitigating the risk of modern slavery and labour exploitation in our operations and supply chain.

About Action Sustainability

Action Sustainability is a specialist consultancy based in London. Its focus is sustainable business and supply chains. Our UK annual turnover is currently £4.4million and we have 61 employees with additional support being provided from a team of associates.

We have a robust and fair recruitment process, utilising specialist recruitment services as well as ensuring that we advertise roles in an open and fair way from the widest talent pool available. As part of our recruitment process, we conduct phone interviews, followed by face-to-face interviews and ensure that we check references, right to work and legal status before offering employment.

Our staff are skilled workers and are paid well above real living wage. We don't use agencies or temporary labour.

As well as providing training and consultancy services for several sustainability themes including, Sustainable Procurement, Social Value, Carbon, Modern Slavery amongst others, Action Sustainability is the delivery partner for the award-winning Supply Chain Sustainability School.

This organisation has been designed to upskill the supply chain in the built environment industry as well as providing opportunities for built environment partners, up and down the value chain, to work collaboratively in order to address key sustainability challenges within the industry.

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Our people

We recognise that people are our best asset and as a result we endeavour to look after them and reward them accordingly.

In terms of the UK operations, we are an accredited Living Wage employer and pay over the living wage and therefore by default the minimum wage. We do not operate any zero hours contracts but utilise associates as part of the wider Action Sustainability team.

All employees within Action Sustainability benefit from a scheme designed to support their physical and mental wellbeing and can part take in flexible working conditions including part time and remote working. In addition to this they benefit from an above industry average pension contribution scheme designed to support their future prosperity.

Our staff have all been trained on what modern slavery is, how to spot the signs and why and how to report any concerns. Other related policies include; Health & Safety, Wellbeing, Equal Opportunities, Grievance, Recruitment, Harassment & Bullying and Whistleblowing.

Our supply chain

Action Sustainability self-deliver most of its work and does not have significant supply chain spend. Where we arrange face to face events, we run them in line with ISO20121 – Standard for Sustainable Events. We ask the venues we use what steps they're taking to manage and mitigate modern slavery risks in their operations – particularly around facilities management. We have now moved to a significant element of our delivery to online so our spend is has significantly decreased. For the remaining elements of our spend, where standards exist to support the eradication of exploitation, we endeavour to request these.

Our business impacts

Whilst our impact on our own supply chain is limited, Action Sustainability's, ability to influence supply chains we work with is extensive. Since the act came into force, we have raised awareness of modern slavery, especially in the built environment industry. Through the Supply Chain School specifically, we have advised and trained over 20,000 people on different aspects of modern slavery due diligence.

We lead and steer the UK's largest anti-slavery collaboration in the UK built environment and and have developed numerous resources designed to raise awareness and support businesses in their own journey in combatting modern slavery.

Our objectives

Although a small organisation Action Sustainability has set objectives for the next 12 months that are designed to formalise further the activities already undertaken both within our operations and our supply chain.

- 1) Refresh the awareness of existing employees and ensure new employees are briefed on the issue of modern slavery and transparency in supply chains

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- 2) Refresh the risk profile of our supply chain spend to identify any additional spend areas that need modern slavery considerations to be included as part of the procurement decision
- 3) Ensure that our events protocol has checks in relation to modern slavery and labour standards requirements
- 4) Assess our due diligence process and evaluate the need for third party accreditation

Governance

This policy statement applies to all employees within Action Sustainability and its operations in the UK.

It is endorsed by our Directors and will be reviewed and monitored annually.

Review

Action Sustainability is committed to the process of continual improvement and this procedure will be reviewed every year, or sooner if deemed necessary' with the respective person notified that the policy is out of date.

Date of approval / revision: 2nd June 2025

Signed:



Ian Heptonstall
Director