



Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers, including children. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

**Service Ceilings Limited** has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the **Modern Slavery Act 2015**.

The company also expects the same high standards from all its suppliers, contractors, and other business partners. As part of its contracting processes, it includes specific prohibitions against the use of modern slavery and expects that its suppliers will, in turn, hold their own suppliers to the same standards. For example, when recruiting subcontracted labour, we ask that if there are any workers associated with a subcontracted gang, the workers be aware of their contracted obligations with that company.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment.

In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, **Service Ceilings Limited** accepts that it has a responsibility through practical and reasonable 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 Service Ceilings Limited t/a SCL Interiors and SCL Interiors (London) Limited or on behalf of in any capacity including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.**

#### **Responsibility for the policy**

The Managing Director is responsible for ensuring that this policy complies with Service Ceiling Limited's legal and ethical obligations. The Managing Director has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in their own business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

#### **Compliance**

The prevention, detection and reporting of modern slavery in any part of Service Ceilings Limited t/a SCL Interiors (London) Limited's business or supply chain, whether in the UK or abroad, is the responsibility of all those working under the SCL brand.



Company or under Service Ceiling Limited/ SCL Interiors (London) Limited control. You are required to avoid any activity that might lead to a breach of this policy. This includes any recruitment agencies or organisations providing labour only. As part of the regular review of suppliers, suppliers are required to confirm that they conform to this procedure and policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager and report it in accordance with the policy. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of Service Ceiling Limited’s business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the SCL brand’s supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager. You can also contact the Government’s Modern Slavery Helpline on 08000121700 for further information and guidance on modern slavery.

Service Ceilings Limited t/a SCL Interiors and SCL Interiors (London) Limited aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring that no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

**Training and communication**

Regular training on this policy and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company’s zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering new or renewed contracts with them. It is a company requirement to ensure that anyone who is responsible for entering or renewing contracts that they are responsible to ensuring payment is made no later than fortnightly and that rates are in line with national minimum wage/London living wage and that everybody is always paid fairly.

**Breach of the policy**

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

Service Ceilings Limited t/a SCL Interiors and SCL Interiors (London) Limited may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

**This policy will be published on the company website and reviewed annually unless circumstances require a review to be undertaken.**

Signed *A. Nurse*

Date *08.08.24*

Position *DIRECTOR*

Name: *ADAM NURSE*