

Modern Slavery Policy Statement for financial year 2025/2026

Purpose

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that ECG Building Maintenance Ltd T/A ECG Facilities Services has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery is a crime and a violation of an individual's human rights. Modern Slavery can take various forms such as slavery, servitude, human trafficking and forced and compulsory labour.

ECG Facilities Services has a zero tolerance approach to any form of modern slavery.

ECG are committed to acting ethically and with integrity and transparency in all of our business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Scope

This policy applies to all employees of ECG and all associated suppliers and sub-contractors who form part of ECG's Supply Chain.

Responsibility for this Policy

The Directors of ECG hold ultimate responsibility for the content of this policy. On a day-to-day basis this policy shall be implemented by ECG's Senior Management Team, who hold the responsibility for its implementation, distribution and monitoring its effectiveness, dealing with any queries about the policy and ensuring internal control systems are audited thus ensuring effective countering of modern slavery.

Our Business

ECG Facilities Services are a provider of Mechanical, Electrical, Building Services and Water Hygiene engineering solutions to a diverse range of clients across every sector of modern society.

Related Policies and Procedures

ECG operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Equal Opportunities & Diversity Policy - This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment Policy - ECG operate a robust recruitment policy, which includes all of the statutory "right to work in the UK" checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing Policy - ECG operates a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Ethical Trading Policy – The Ethical Trading code explains the manner in which ECG behaves as an organisation and how ECG expect our employees and supply chain partners to act.

ECG's Supply Chain

ECG Facilities Services operates a robust procurement policy. Any potential supplier or subcontractor that wishes to carry out business with ECG must first qualify through an extensive online questionnaire, and submit the required supporting evidence as to how individual organisations manage Modern Slavery within their own businesses as well as those of their own supply chain partners, (where applicable). All submissions are vetted to ensure that both statement and supporting evidence meets ECG's requirements.

On after being approved can a supply chain partner carry out business with ECG and even then they are legally bound to fully accept ECG's Terms and Conditions of Engagement, that require the supply chain partner to confirm that:

1. They have taken all steps to eradicate modern slavery within their own business.
2. They hold their own suppliers to account over modern slavery.
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.
5. We may terminate the contract at any time should any instances of modern slavery come to light].

Training

All ECG employee are required to participate in Equality, Diversity, Inclusion and Modern Slavery training on an annual basis. ECG's Procurement Team are highly experienced and knowledgeable in the requirements of Modern Slavery adherence.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Board of Directors on 01st May 2025



Mr Peter McKay – Managing Director



Mr Simon Paul – Managing Director

Dated 01.05.2025