

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

May 2023



PORTVIEW FIT-OUT LIMITED

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

Portview Fit-Out Limited 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. Portview Fit-Out Limited takes a zero-tolerance approach to slavery and human trafficking and we expect our supply chain partners 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 within our supply chains.

Portview Fit-Out Limited is an interior fit-out company. Our business is focused within the retail, stadia, hospitality, hotel, health sciences, higher education, commercial, and residential sectors. Portview Fit-Out Limited employs over 100 people throughout the UK and Ireland.

Portview Fit-Out Limited has an annual turnover in the region of £50 million. To find out more about the nature of our business, please click www.portview.co.uk.

We work with a supply chain that includes sub-contractors, suppliers, manufacturers, professional consultants (providing design and other building related services), and labour agencies. We contract with these organisations for the provision of works, goods, services, and labour.

Portview enshrines the following in our contracts of employment and expects our supply chain to adhere to the same principles:

- freedom of workers to terminate employment
- freedom of movement
- freedom of association
- prohibits any threat of violence, harassment, and intimidation
- prohibits the use of worker-paid recruitment fees
- prohibits compulsory overtime
- prohibits child labour
- prohibits discrimination
- prohibits confiscation of workers' original identification documents
- provides access to remedy, compensation, and justice for victims of modern slavery

Portview will provide the latter by using the national referral mechanism, criminal justice system, civil courts, the independent Anti-Slavery Commissioner, and any other NGOs as appropriate.

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, goods/materials, recruitment practices, and site management. Projects often include many contractors, including lower skilled trades which increases the potential risk of labour exploitation.

We are members of Constructionline, which help us to assess the compliance of UK subcontractors and suppliers at the pre-qualification stage of our procurement processes. We also assess the labour standards

and ethics of suppliers that we engage with using the Supplier Ethical Data Exchange (SEDEX).

Our commitment to reducing the risk of labour wage exploitation is demonstrated by our membership and accreditation of the Living Wage Foundation. We wholeheartedly believe in and champion their ethos that a hard day's work deserves a fair day's pay. We voluntarily pay a higher rate of base pay to all our employees and to the sub-contractors who work on our sites. The Living Wage provides a benchmark for responsible employers who choose to pay their employees a rate that meets the basic cost of living in the UK. It is higher than the government's National Minimum Wage rates, including the minimum wage rate for over-25s (the 'National Living Wage') because it is calculated according to the cost of living.

In addition, we are also a London Living Wage employer which is calculated annually and is based on the best available evidence about living standards in the capital. We pay this rate to all our employees and sub-contractors working on our sites located in all boroughs within Greater London.

We require that all those in our supply chain comply with our values. We require all our supply chain to pre-qualify by assessing their suitability to work for us across a number of criteria. This includes them signing up to adhere to this policy and its standards. We do not tolerate slavery or human trafficking within our supply chains. For example, if we find evidence of a failure to comply with this statement, we will immediately seek to investigate to determine if any concerns exist with regards to potential breaches of this policy, and if found to be the case we will terminate our relationship with the relevant supply chain member and follow up with the relevant government agencies.

To achieve the desired outcomes of this policy Portview mandates that all staff undertake online training with regards to Modern Slavery and Human trafficking and its impacts on people, its warning indicators being:

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

Portview have identified the following risk assessments as relevant to our operations:

- Country risk assessments / Supply Chain risk assessments: currently we only operate in the UK and Ireland and consider these as relatively low risk. Where we source materials from other non-EU countries, we use SEDEX to evaluate the risk in this regard.
- Vulnerability assessments: A vulnerability assessment is also an appropriate risk assessment for modern slavery. This involves identifying individuals and groups who are at higher risk of becoming victims of modern slavery due to factors such as poverty, social exclusion,

migration status, and lack of access to education and employment opportunities, via a site set up checklist review and site audit procedures.

Measuring modern slavery is a complex task, and Portview has selected the following key performance indicators (KPIs) to assess the prevalence and impact of modern slavery in our own organisation and our supply chain:

- **Number of identified victims:** This KPI measures the number of people who have been identified as victims of modern slavery. This will be used to track changes in the prevalence of modern slavery over time and will be measured within our organisation and in our supply chain.
- **Supply chain transparency:** Companies can measure the level of transparency in their supply chains as a way to identify potential risks of modern slavery. Portview will measure the number of companies in our supply chain who have their own Modern Slavery and Human trafficking policies.
- **Prosecution rates:** Measuring the number of modern slavery cases that result in prosecution and conviction can help assess the effectiveness of law enforcement efforts.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Portview Fit-Out Limited's slavery and human trafficking statement for the financial year commencing 1st December 2021 and ending 30th November 2022.

This statement was approved by Simon Campbell, Managing Director on 15th May 2023.

Signature:



Simon Campbell, Managing Director

	COMPANY GENERAL	
	Applicability: Integrated Management System	Issue No: 4 Issue Date: 15/05/23
	Title: PVF-POL-HR-Anti Slavery & Human Trafficking Policy Statement	Ownership: Managing Director