



# Robertson Modern Slavery Act Transparency Statement



September 2019

## Introduction from the Executive Chairman

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 for the current trading year to the 31st March 2020 and sets out the steps that Robertson 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 encompasses slavery, servitude, human trafficking and forced labour. Robertson has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.

## Organisation structure

The Robertson business is a privately-owned portfolio of individual companies working in infrastructure, support services and construction throughout the UK.

Robertson comprises 22 businesses, directly employing over 3200 people. These include regionally based construction companies, timber engineering, facilities management, a capital projects business dedicated to public sector partnerships, property development, regeneration, civil engineering, building services, and housebuilding for the private and affordable markets.

Our approach to policy and procedure encompasses all areas of the group portfolio. For the avoidance of doubt, this Modern Slavery Act Transparency Statement covers both Robertson Group and Robertson Residential Group including all individual trading businesses listed below that meet the requirements identified in the Modern Slavery Act.

Company	Co Number
Robertson Group Limited	SC060077
Robertson Group (Holdings) Limited	SC356297
Robertson Construction Group Limited	SC347921
Robertson Construction Northern Limited	SC249934
Robertson Construction Eastern Limited	SC249936
Robertson CE Limited	SC249935
Robertson Construction Tayside Limited	SC292999
Robertson Construction Central Scotland Limited	SC249933
Robertson Facilities Management Limited	SC185956
Robertson Regeneration Limited	SC303903
Robertson Timber Engineering Limited	SC166924
Robertson Capital Projects Limited	SC227159
Robertson Property Limited	SC103106
Robertson Strategic Asset Management Limited	SC590563
Robertson Residential Group Limited	SC590044

Robertson Homes Limited	SC151825
Robertson Partnership Homes Limited	SC211357
Robertson Living Limited	SC565222

## Internal policies

Robertson has in place a number of policies to ensure that we are conducting our business in an ethical and transparent manner. These include:

- recruitment policy;
- whistleblowing policy;
- ethical procurement policy; and
- equal opportunity policy.

Any breach of Robertson policy will be regarded as a serious matter and will result in appropriate action being taken.

## Our supply chain

As a result of our diverse business structure, our engagement with the external supply chain has developed to provide the sourcing of subcontract services, products and materials direct from manufacturers and through third-party distribution channels and the provision of agency labour.

Robertson conducts due diligence on all suppliers. The due diligence includes an online search to ensure that suppliers have not been convicted of offences relating to modern slavery.

In addition to the above, as part of our contract with any supply chain member, we require that they confirm to us that:

- they have taken steps to eradicate modern slavery within their business;
- they hold their own supply chain to account over modern slavery; and
- they pay their employees at least the national minimum wage / national living wage (as appropriate).

Robertson shall enforce its contractual rights should any instances of modern slavery come to light.

We are fully committed to making sure that no business practices that would contravene Section 54, clause 5 of the Modern Slavery Act, are tolerated, either internally or through our external supply chain.

## Training

We regularly conduct training for our procurement/buying and commercial teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

## Our performance indicators

We will record 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. We will do this through the measurement and escalation of any reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

## Due diligence and risk awareness

### Employees

Compliance with this policy forms part of all employees' obligations under their contract of employment. Employees are required to familiarise themselves with all policies and procedures to assist in the identification and prevention of criminal acts.

### External supply chain

We currently trade with circa 3000 supply chain members who are committed to meet both legal and ethical standards in their daily operations, while ensuring that compliance is managed appropriately across their own supply chain partners.

We recognise our statutory obligation to set out the steps we have taken as a business to ensure that no acts of modern slavery or human trafficking are evident in our supply chain. However, we also acknowledge that we do not control the conduct of individuals and organisations within our supply chain. To support our commitment, we have during the financial year ending 31<sup>st</sup> March 2019 developed and implemented the following measures.

- Undertook a desk top review of compliance with Modern Slavery requirements for our top 400 supply chain members relating to 80% of our annual supply chain spend.
- Continued to develop awareness of modern slavery through focused e-learning to all employees as part of the core training requirements for related staff.
- Further developed compliance relating to the provision of both temporary and permanent labour requirements, utilising a controlled Preferred Supplier List (PSL) across all areas of the business, to support our compliance with UK Immigration and Employment Law.
- Continued to reinforce our drive to improve both awareness and compliance across all areas of the supply chain through the introduction of a group-wide supply chain conference, supporting supply chain awareness events and compliance survey.
- Promoting supply chain membership with the Supply Chain Sustainability School to provide greater guidance and support to all members of the supply chain.

Robertson is committed to continually reviewing and updating our approach to identifying and managing risk associated with our supply chain, we have committed to undertaking the following steps during both current and future trading periods.

- Proactively develop awareness throughout the business to ensure that all employees have a full understanding of the effects of modern slavery and how we can work together with our supply chain to increase awareness in addressing these issues.

- Develop on-site controls through implementation of enhanced processes and procedures that support the ability to identify specific risks associated with modern slavery whilst providing a platform to support future improvements.
- Enhance our programme of engagement with our supply chain, which identifies areas of high risk, to increase our influence on activities throughout their full value chain.
- Utilise external resources to support both awareness of risk and development of controls to address this issue across all areas of our internal business and extended supply chain.

## Declaration

This statement is made in accordance with our obligation to Section 54, Clause 5 of the Modern Slavery Act and will be reviewed and updated annually by the Robertson Board.



Derek W. Shewan  
Chief Executive Officer  
Robertson Group