



Anti-Slavery and Human Trafficking Statement (2017)

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Statement

1. Structure Tone Ltd is a Tier 1 fit out contractor with circa 100 employees. The team operate under a board of directors with departments consisting of Operations, Commercial, Pre-Construction and support divisions. Subcontractor and suppliers are relied upon within all aspects of the business.

2. The company holds an Anti-Slavery and Trafficking policy that forms part of the employee handbook and induction process. Structure Tone, Inc. takes a zero tolerance approach to slavery and trafficking.

3. All members of our supply chain are under agreement to comply with the Modern Slavery Act 2015. Those who have a turnover of over £36 million can either provide a copy of their policy or sign to say they comply with the Structure Tone, Inc. policy. A risk assessment has been carried out focusing on smaller businesses who are not required to have their own policy and those who have international business connections.

4. All staff are trained thoroughly on the importance of complying with the policy and reporting any staff or supplier they suspect not to be complying. All new starters are also trained as part of their induction.