

Modern Slavery Act 2015 Statement

CompcO Fire Systems Ltd.

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This statement is made pursuant to S.54 of the Modern Slavery Act 2015 and sets out the steps that CompcO Fire Systems 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.

Our Structure

CompcO Fire Systems is the largest privately owned fire sprinkler installer, operating throughout England, Scotland and Wales. Our head office is based in Worcester and was established in 1988. Our annual turnover is in excess of £36m and we employ over 200 staff. We do not have any trading activity outside of the United Kingdom.

Our Business

Our key objective is to design, install and service fire sprinkler systems for the commercial and residential market. We aim to have a positive impact on our clients we work for, as well as those that work for us. Our main activity is the supply of services and goods to construction industry.

Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include but are not limited to:

- CompcO Employee handbook
- Ethical Conduct and equal opportunities
- Bribery and corruption policy
- Proof of right to work in the UK
- Making a protective disclosure (Whistle blowing) (covered in Company handbook)
- Worksafe policy

Our Supply Chain

Our supply chain mainly consists in the supply of components for use in our installations and the running of the business, from suppliers based in the United Kingdom.

The main areas of supply relate to fabrication, equipment, and Labour, as part of our review we have identified that there are some items being sourced by our suppliers from outside the United Kingdom, such as valves, sprinkler head components, we have procedures within our procurement to vet these.

Our procurement from these suppliers is a centralised function which requires the use of pre-approved suppliers which means we have controls in place for committed expenditure and also the option to complete due diligence and retrospective checks.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery

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3. They pay their employees at least the national minimum wage / national living wage (as appropriate in the UK)
or
They pay their employees any prevailing minimum wage applicable within their country of operations (overseas)
4. We may terminate the contract at any time should any instances of modern slavery come to light.

Our procurement policy is designed to ensure we operate in a legal and ethical manner. We expect all suppliers to commit to comply with all laws, regulations and our policies and terms of supply.

We take a zero tolerance approach to abuse of human rights, slavery, servitude, forced or compulsory labour and human trafficking. Any supplier that fails to meet our standards will jeopardise their ability to trade with us and we may ultimately cease trading with any such supplier.

Safeguarding

We work closely with our clients and we have noted that the most vulnerable groups in the UK for modern slavery could include migrant workers, illegal immigrants, asylum seekers, homeless people, travellers and people suffering from learning difficulties.

We already have detailed procedures, operating documents and training for safeguarding and we are working on how we can educate our staff on modern slavery and help identify anyone in the community we believe may be at risk of abuse.

Our Staff

Compc Fire Systems has strict HR policies and procedures that ensure compliance with legislation and ensures fair and equal treatment, dignity at work and prevents discrimination.

Our policies and operating documents are available to all staff. We encourage all staff to report any activity they believe to be in breach of any of our operating standards or policies to Line Managers or Directors.

Due Diligence

We are committed to ensuring there is no modern slavery or human trafficking in any part of our business.

We will continue to:

- Identify and assess risks in our supply chain and ensure compliance from our suppliers.
- Provide training for our staff in these risks.
- Protect whistle blowers.

Signed: John Sinclair

Rev: September 2017



Managing Director