

This is the third Modern Slavery Statement of the ESS Modular Group. It is made on behalf of all the Group's subsidiaries, including Spatial Initiative Limited, Extraspace Solutions (UK) Limited and Extraspace Solutions Ltd (together referred to as "**ESS Modular**").

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## **INTRODUCTION**

Following the change in ownership of Spatial Initiative Limited in 2020 and the continued growth of Extraspace Solutions (UK) Limited thereafter, the obligation for ESS Modular to publish a Modern Slavery Statement was triggered in 2021. Since then, ESS Modular has continued to build upon the progress made in 2021. In 2023, ESS acquired the assets of Eco Modular, as part of a pre-packaged administration, which included an additional production facility and office space.

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## **MODERN SLAVERY**

The rapid rise in global migration contributes to the increased risk of slavery, servitude, forced labour and human trafficking – together known as Modern Slavery. Every business, irrespective of the industry in which it operates, faces the very real risk that Modern Slavery exists within its supply chains. ESS Modular recognises that it is no exception.

ESS Modular remains committed to a 'zero tolerance' approach to Modern Slavery and has continued to work to improve its response to the risk that Modern Slavery may exist within its supply chains – however small or seemingly insignificant such a risk may be.

We are working to manage the risk in a number of ways.

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## **MANAGEMENT RESPONSIBILITY**

ESS Modular's Head of Supply Chain is an experienced construction procurement professional and, with co-operation and support from the operational business and support functions, leads ESS Modular's Modern Slavery risk management and initiatives.

Through our Head of Supply Chain, ESS Modular continues to work with Modern Slavery Thought-Leaders such as Stronger Together. This allows ESS Modular to capitalise on valuable experience of implementing risk management which is specifically focussed upon tackling Modern Slavery within UK businesses.

ESS Modular is registered to the Gangmasters and Labour Abuse Authority ("GLAA"). This is a joint agreement with some of the biggest names in UK construction aimed at eradicating slavery and labour exploitation in the building industry. As a result, we are provided with useful industry-specific guidance and other resources by GLAA. This further enhances our own policies and risk management procedures.

Working closely with our Director of Operations, our Head of Supply Chain leads ESS Modular's Modern Slavery Risk Team, which meets quarterly. Together, they continue to assess and review the risk of Modern Slavery in ESS Modular's supply chains, together with appropriate responses to these risks. The team comprises managers from our Human Resources, Health & Safety and Purchasing Teams.

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## **OUR PEOPLE**

The fluctuating demands of project-based work determine that we often need to rely on agency or temporary staff. ESS Modular has relationships with a number of preferred supplier recruitment agencies. Service level agreements are in place with each of these agencies, which provide for commitments around Modern Slavery from these suppliers. We have now audited each of these

agencies that are UK based to allow better visibility on their methods of recruitment and management of human resource. Over the coming year, we will also audit all those agencies that are based in Ireland.

Going forwards, the relationships with agencies will be reviewed every 6 months and audited every 3 years.

Modern Slavery Training has now been rolled out to all ESS Modular employees and will also be undertaken by all new recruits.

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## OUR BUSINESS

ESS provides off-site precision manufacturing, design, project management and construction services to a variety of sectors, including education, healthcare, justice and defence. We subcontract many trades and services to third party organisations, and source all goods and materials (whether for our client's projects or for use by the business directly) through third party suppliers.

Working under the guidance and governance of our Health & Safety Team, our manufacturing and site teams are responsible for ensuring that basic labour standards and welfare facilities are in place in all our factories and on all our sites.

Over the last 12 months, we have enhanced both our site and factory health and safety inspections to include checks for signs of Modern Slavery, and verification that information and posters from GLAA are visible and accessible across all our sites.

We have also enhanced our site induction process. It now outlines risks and warning signs of Modern Slavery and what to do if slavery is suspected.

Posters are visible and useful information is available in all our factories.

All of this is underpinned by a commitment to working in accordance with our corporate values.

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## OUR SUPPLY CHAIN

As part of our subcontractor pre-qualification process for both the UK and Ireland, ESS Modular now requires each subcontractor to provide a copy of its own Modern Slavery Policy.

We have also implemented a new pre-qualification process for both the UK and Ireland which applies to suppliers of materials and labour. This includes for provision of Modern Slavery Policies and/or details of how this risk is managed by the supplier.

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## POLICIES AND CONTRACTUAL CONTROLS

As part of an annual review process, ESS Modular has recently reviewed its **Anti-Slavery Policy** and supporting documentation to ensure that it remains appropriate and robust.

In addition, ESS Modular operates a **Whistleblowing Policy**. Although this is aimed principally at employees, it also extends to other workers and contractors. The policy encourages people to report any instances of wrongdoing or unethical behaviour without fear of reproach. The policy expressly includes matters associated with Modern Slavery. All concerns will be investigated in line with the policy, and the company is committed to providing protection and support for whistle-blowers.

ESS Modular has used the Cabinet Office's Modern Slavery Assessment Tool to identify Modern Slavery risks and assist with management of the same. We intend to repeat this assessment regularly, and no less than once a year to support driving continuous improvement.

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## MODERN SLAVERY RESPONSE PLAN

ESS Modular has reviewed and updated its **Modern Slavery Response Plan**, which details the steps and measures that the company will take in the event of discovering evidence of Modern Slavery within its supply chain. As per our Anti-Slavery policy, all our employees and supply chain partners are responsible for reporting any suspected instances of modern slavery with our business or in our supply chain. The plan details how we will:

- Determine the appropriate enforcement body or victim support organisation to contact
- Protect and support at risk individuals
- Report to authorities
- Capture and protect evidence

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## THE FUTURE

In the coming months, ESS Modular will further implement the following elements of a long-term Modern Slavery programme. We will report on these in our next annual Modern Slavery Statement:

- **Our People**
  - We will add information regarding Modern Slavery and the associated risks to our intranet. We will also roll out an associated communications programme.
  - We will carry out planned audits for labour agencies in both the UK and Ireland.
- **Our business**
  - We will create and roll out guidance for the benefit of our site managers to raise awareness of the risk of Modern Slavery and help them identify warning signs.
  - We will repeat assessment of ourselves using the Cabinet Office's Modern Slavery Assessment Tool to identify Modern Slavery risks and assist with management of the same.
- **Our Supply Chain**
  - We will carry out Modern Slavery audits, prioritising subcontractors and suppliers who we consider high-risk.
  - We will also communicate our plans to our supply chain, to help raise awareness within their businesses.
  - Wherever possible, we will look to enhance existing risk management to ensure that identifying and addressing the risk of Modern Slavery remains a focus.

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## CONTINUED COMMITMENT

ESS Modular understands that the risk of Modern Slavery is dynamic and ever evolving. For this reason, we intend to regularly review our approach to assessing and mitigating the risk of Modern Slavery. In doing so, we hope to guard against complacency and improve on a continuous basis.

This statement was approved by the Board of Kardomagh Holdings Limited, the parent company of the ESS Modular Group.

Signed



**Simon Rawson**

CEO, ESS Modular

Date: 29<sup>th</sup> August 2023