

PARKERAY HOLDINGS LIMITED SLAVERY & HUMAN TRAFFICKING STATEMENT

Forced, bonded or compulsory labour, human trafficking and other kinds of slavery and servitude represent some of the gravest forms of human rights abuse in any society and will not be tolerated within our operations or our supply chain.

This is our first public statement made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 through which we seek to set out our current approaches and policies while at the same time begin to demonstrate how we intend to act moving forward and build upon year on year.

ORGANISATIONAL STRUCTURE

Parkeray is an established London based construction group that operates in the South of England, focusing primarily on the interior fitting out of commercial offices. Parkeray Holdings Limited has two wholly owned trading subsidiary undertakings:

- Parkeray Limited (Provision of Interior fit-out services)
- Parkeray Trustees Limited (Non-trading)

Our 2016 turnover has been our largest to date: £81 million delivered across seventy-five projects ranging in value from a few thousand up to £7million); in doing so, Parkeray employed directly 120 staff members.

CURRENT APPROACH AND STEPS UNDERTAKEN IN 2016

We appreciate that Parkeray does not exist in isolation and that pretty much everything we do has a social and environmental impact in some form or another, we care about this and hold ourselves accountable and responsible for our actions. In doing so, we are heavily reliant on our workforce and our supply chain partners.

Our Social Justice Policy underpins everything we do; it is a mandatory requirement which extends to every individual working for or on behalf of Parkeray. It requires all of us to act ethically and comply with legal requirements at all time, putting our principles into practice in everything we do. Such is the culture of the company we are confident suspected breaches of this policy will be raised and addressed appropriately.

DIRECT EMPLOYEES

With the vast majority of our work undertaken within Central London and a desire to ensure fairness, all of our employees are paid significantly above the London Living wage with our younger employees on training contracts being paid well above the minimum wage for the 25+ age category. Payments are made by bank transfer with no payments made through third-party bank accounts.

All of our employees are required to provide evidence of their eligibility to work in the UK.

AGENCY LABOUR

We have a formal agreement with two Agencies to provide us with temporary staff as and when required. The agreements are renewed annually with twice yearly reviews. The Agencies are aware of the need to adhere to our Social Justice Policy; a commitment to which is a pre-cursor to any continued involvement. The Agencies are required to bear the responsibility for vetting their candidates for their eligibility to work in the UK. Our HR team undertakes spot checks on this vetting process during the year.

THE SUPPLY CHAIN

Every subcontractor and supplier is made aware of and is required to adhere to our Social Justice Policy.

By its very nature, the construction supply chain is complex, and there are often many tiers of suppliers between Parkeray and the source of the raw materials; often with procured services and materials flowing from all parts of the world.

Our commitment to our Social Justice Policy extends downwards through the supply chain. A supplier that we have a direct contractual arrangement with (a Tier 1 supplier) in turn bears the responsibility for ensuring, as far as is practical, compliance across their direct supply chain (Tier 2 suppliers) and so on.

RISK

Our assessment of risk can be categorised under four headings; directly employed staff, materials directly procured, agency labour and bona-fide subcontractors. Based on a proportion of turnover spend and our assessment of the level of controls currently in place, we have assessed our level of risk and exposure as follows:

DUE DILIGENCE & RISK	DIRECT EMPLOYEES	MATERIALS DIRECTLY PROCURED	AGENCY LABOUR	SUB-CONTRACTORS (ALL TIERS)
PERCENTAGE OF TURNOVER	8.6%	3.85%	2.76%	74.6%
CONTROL LEVELS (1 = POOR, 5 = GOOD)	*****	***	***	**
LEVEL OF RISK / EXPOSURE	Low	Medium	Low	Medium/High

TRAINING AND INCREASED AWARENESS

We recognise that human rights can only be realised through an informed and continued demand for their protection, in doing so we understand for us to play a part in this process, we will need to find ways to educate and raise awareness of the problems the world faces with modern slavery and human trafficking.

We realise that it is important that any training we provide to our employees is targeted to have the best effect; our risk profiling identifies that the strongest need and biggest area of exposure is that of modern slavery within our supply chain. Because of its complex nature, we are looking to work with external organisations such as 'stronger2gether.org' to provide the education and training we require.

As newly registered members we immediately have access to their website and a monthly newsletter which we are already rolling out to our staff base. Over the coming months, we will be meeting with stronger2gether to identify how best we can provide guidance and good practice advice in preventing, uncovering and reporting slavery and human trafficking, that may be occurring within any part of our business.

In doing so, we are keen to understand, educate and work with our supply chain to avoid those countries and products where slavery is most likely to be most prevalent. www.productsofslavery.org

TARGET SETTING

Moving forward, we intend to utilise our current period of trading to identify planned actions for our staff base and supply chain to increase awareness, transparency and to help to effect change. This is a platform upon which we seek to build upon annually.

For and on behalf of Parkeray Limited signed:



Mike Murray CEO

30th June 2017