

# Modern Slavery Statement

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Issue Date: **January 2024**  
Review Date: **January 2025**

Issue: **4**

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## **Organisation**

This statement applies to Medlock FRB Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2024/2025.

## **Organisational structure**

Medlock FRB Ltd was established 2006 and is a specialist fit-out contractor operating within the Leisure and Hotel sector. Our business is UK based and we have one head office location in Oldham, directly employing approximately eighty people across multiple disciplines. We operate on client projects throughout the UK and these projects are split into three core areas, fit out, refurbishment and build.

The organisation is controlled by a Board of Directors.

## **Definitions**

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat.
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse.
- being dehumanised, treated as a commodity or being bought or sold as property.
- being physically constrained or to have restriction placed on freedom of movement.

## **Commitment**

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

## **Supply chains.**

In order to fulfil its activities, the main supply chains of the Organisation include those related to the purchase of materials, supply of services and labour from a number of suppliers including sub-contractors, consultants, material suppliers, distributors, labour suppliers, and professional services suppliers.

## **Potential exposure**

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist through our supply chain where certain areas are out of our control. Our focus on a more robust supplier verification process will assist in reducing our exposure.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited.

## **Steps**

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has or will be taking the following steps in 2023/24 to ensure that modern slavery is not taking place:

- reviewing your supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.
- measures in place to identify and assess the potential risks in its supply chains.
- undertaking impact assessments of its services upon potential instances of slavery
- creating action plans to address risk to modern slavery.
- any actions taken to embed a zero-tolerance policy towards modern slavery.
- any training provided to relevant staff on modern slavery.
- Reviewing industry best practice with emphasis on the Stronger Together Initiative

## **Key performance indicators**

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

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- Modern Slavery Training for all workforce
- Development of a Supply Chain verification process to evaluate their adherence to modern slavery protection before entering business.
- Retrospectively apply our supply chain verification process to long term suppliers
- Ensure full adherence with modern slavery in line with our quality assurance standards, ISO 9000, 14001 & 45001

## **Policies**

The Organisation has the following policies which further define its stance on modern slavery:

- Modern Slavery Policy
- Right to Work Policy
- Recruitment Policy
- Whistleblowing Policy
- Supplier Policy

## **Slavery Compliance Officer**

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action regarding the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Authorised by.

A handwritten signature in black ink, appearing to read "Colin Drury".

Colin Drury  
**Executive Director Finance**

6<sup>th</sup> January 2024