

MODERN SLAVERY STATEMENT

SPARTA SYSTEMS LTD

A) ORGANISATION

This statement applies to Sparta Systems Ltd (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year 2020-21.

B) ORGANISATIONAL STRUCTURE

Sparta Systems Ltd is a West Yorkshire based construction company specialising in SFS, drylining, plastering and firestopping. Although the Organisation has a small head office in Otley, West Yorkshire works are predominantly carried out on sites across Yorkshire & the North East. The Organisation is controlled by two directors, Mathew Bates & Simon Jones.

Levels of work fluctuate based upon the projects we are operating on at any one time. Sparta Systems Ltd attempts to secure projects which will allow us to keep labour levels reasonably consistent, however individual project timings vary and are subject to change. The type of work we undertake is done throughout the year and therefore not subject to seasonal fluctuations.

The labour supplied to the Organisation in pursuance of its operation is carried out in the United Kingdom.

C) 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 or 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.

D) 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, and in many cases exceeds those minimums in relation to its employees.

E) SUPPLY CHAINS

In order to fulfil its activities, the Organisation’s main supply chains include those related to the supply of construction materials from various suppliers in the United Kingdom, who are subject to UK law.

We understand that the Organisation’s first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

F) POTENTIAL EXPOSURE

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist within Sub-contractor labour.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

G) 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 taken the following steps to ensure that modern slavery is not taking place:

- All sub-contractors complete an operative starter form (including operatives working for limited companies)
- All operatives must provide the appropriate right to work documentation
- All managers have undergone some modern slavery awareness training to ensure that they are aware of the signs that someone may be subject to modern slavery
- Zero-tolerance approach towards supply chain. No orders will be placed with suppliers convicted of breach of the Modern Slavery Act 2015.

H) POLICIES

The Organisation has the following policy which further defines its stance on modern slavery which is included within the Employee Handbook:

- Anti-Bribery Policy

I) TRAINING

The Organisation provides the following training to staff to effectively implement its stance on modern slavery:

- All managers have undergone some modern slavery awareness training to ensure that they are aware of the signs that someone may be subject to modern slavery
- Regular Toolbox Talks are completed regarding Modern Slavery to educate all operatives on the general indicators that someone may be a victim
- Posters are displayed in all site offices with the Modern Slavery helpline number, so that they are able to contact them should they themselves be a victim or know someone who might be.
- As a member of the Supply Chain Sustainability School some employees have completed the Modern Slavery E-Learning modules to further develop their understanding of the issue.

K) 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 with regard to the Organisation's obligations in this regard.

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

Date of approval: 28 May 2020

A handwritten signature in black ink, appearing to be 'M. J. Gold', written in a cursive style.

[*Commercial Director*]