



The Modern Slavery Act Parameters

Section 54 of the Modern Slavery Act 2015 requires that a commercial organisation within subsection (2) must prepare a slavery and human trafficking statement for each financial year of the organisation which is directly relevant to their business.

CBB Ltd does not meet both of the criteria which requires that the business must comply with the act, however, in the interest of best practice and to demonstrate our commitment to transparency in supply chain management, we do adopt the act and comply with its requirements.

CBB Ltd is committed to driving out acts of modern day slavery and human trafficking within its business and from within the supply chains, including any specialist sub-contractors and partners.

Required Action

CBB Ltd will publish a Slavery & Human Trafficking Statement at the end of each financial year. This statement will include the following information:

1. Detail the steps that we have taken during the financial year to ensure that slavery and human trafficking is not taking place in our own operation or that of our supply chain.
Or
2. In the unlikely event that we have not taken any steps in a particular year, we will make a statement to that effect.

The Slavery & Human Trafficking Statement will be published annually at the same time as the annual reports and accounts are compiled for submission to Companies House. The Slavery & Human Trafficking Statement will be approved and signed by all the Directors prior to release.

The Slavery & Human Trafficking Statement will be available to our customers and suppliers upon request.

The Slavery & Human Trafficking Statement

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery; servitude; forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another, in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending March (2018) which will be issued by end of June (2018)

Business Structure

CBB Ltd was established in 1988 with the object of providing high service to the building services engineer; the supply of component spares and engineering solutions. The business has now developed into 3 key business areas:

Products –

To become a “one stop shop” solution for product to account customers in the supply of all engineering and consumables needs, which will ideally be locally sourced within the borough or UK mainland.

Engineering –

To manage, supply, install, maintain and replace all mechanical and electrical plant at a client’s premises.

Projects –

To plan, supply, manage, install and replace all mechanical and electrical plant at a client’s premises on a large scale.

CBB Ltd is dedicated to promoting business through best practise and the consideration of social, ethical and environmental issues.

CBB Ltd operates solely in the in the UK market, predominately in London and draws resource from both fully employed engineers and sub-contract engineers in the delivery of the above services.

Our suppliers of materials are all UK based Companies, some of which have overseas production companies. The overseas interests of our suppliers are considered to be the area at the highest risk of slavery or human trafficking.

A review of our material suppliers is carried out on a regular basis. These reviews include validation from the supplier that no slavery or human trafficking is in any way connected to the people working in subsidiary companies. In addition, visits are undertaken every 5 years to premises in China and India.

Specialist sub-contractors undergo a rigorous assessment to ensure that they meet CBB Ltd standards on competency; certification, insurances and that they can meet best practise industry standards.

We ensure that they have a strong employment process and that they in turn ensure that no one is employed under any form of duress. Sub-contractors premises are also visited on an annual basis to validate that they continue to operate in an ethical and responsible manner and that initial assessment standards are being maintained.

Any Policies Relevant to Slavery & Human Trafficking

CBB Ltd acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation deal with any business knowingly involved in slavery or human trafficking.

The Directors and management team will take responsibility for implementing policies that ensure resources is made available to monitor that slavery and human trafficking is not taking place within the organisation or within its supply chain.

The current policies have been adopted by CBB Ltd relevant to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking operations include the following policies:

- CBBP 01 Corporate Policy System
- CBBP 02 Health & Safety Policy

CBBP 03	Equality, Diversity & Inclusion Policy
CBBP 06	Modern Slavery Policy
CBBP 07	Bribery & Corruption Policy

Due Diligence Processes

CBB Ltd operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier.

Sub-contractors undergo a rigorous assessment to ensure that they meet CBB Ltd standards in competencies; certification, insurances and that they can meet best practise industry standards.

Both sub-contractors and new stock material suppliers are subject to our audit and compliance requirements and are 3rd Party audited on a regular basis. Due diligence also includes an online search to ensure that the organisation has never been convicted of offenses relating to modern slavery and on site audits which include a review of working conditions. Further, all suppliers are required to confirm that no part of their business operation contradicts the modern slavery act.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that they either have a modern slavery policy of their own in place or, at the very least, they are aware of the act and do not contravene its intentions in any way and can confirm the following:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. UK suppliers pay their employees at least the national minimum wage or at best the national living wage. All our key suppliers are UK based
4. We may terminate the contract at any time should any instances of modern slavery come to light.

Steps To Assess & Manage Risks

Details of the due diligence undertaken by CBB Ltd on new suppliers and when reviewing existing suppliers includes the following processes:

The supply chain is mapped to assess a particular product or geographical risks. As a result, 90% of our suppliers are UK based with the majority having a UK manufacturing base.

All sub-contractors are concentrated within the M25 area as this is the key area for the engineering business activity.

Any new supplier or subcontractor is subject to an evaluation against our standards with regards to modern slavery and human trafficking. Suppliers who meet our strict criteria are granted an approved supplier status.

The supply chain is reviewed on regularly in two specific ways. Supplier visits are undertaken by the purchasing department to ensure that the supplier meets our specific criteria. A Director will visit their premises to ensure that the organisation, facilities and resources are as expected.

A supplier's performance is also monitored at the "goods in" checking process and any failures are recorded and communicated to the supplier. Discussions may follow to agree an effective corrective action plan which is in turn monitored for effectiveness through implementation.

A sub-contractors performance is monitored by the works co-ordinators and the Engineer in charge. Customer feedback is actively sought at job completion to ensure that they are satisfied with all aspects of the work and the behaviour of our operatives on site. Failure in any aspect of site work is reviewed and an effective corrective action plan is implemented. This plan is then monitored until we are satisfied that the issue has been resolved.

No reports are received from employees, the public or law enforcement agencies to indicate that modern slavery practices have been identified.

Training Key Personnel

We regularly conduct training for our procurement manager so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and or human trafficking is not taking place within our business or supply chain if there are no adverse findings to the due diligence and risk management process.

Approval for This Statement

This statement has been approved by the Board of Directors as identified below



Paresh Patel



Sadhna Patel



Ricky Harrynarine