

MODERN SLAVERY STATEMENT

Comex 2000 has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all our business dealings and relationships. We are also dedicated to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within our business or supply chains, consistent with our obligations under the Modern Slavery Act 2015.

This statement sets out our actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own company or our supply chains. This statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2018.

ORGANISATIONAL STRUCTURE & SUPPLY CHAINS

The Company is privately owned and is a leading provider of network and communication services throughout the UK. The Company's supply chain is primarily based in the UK and supplies aggregates, components and telecom cables. In addition, the company makes extensive use of a range of subcontractors from labour only to fully serviced labour, plant and equipment providers responsible for service delivery.

A number of our clients supply materials to us directly on a free issue basis which they are responsible for sourcing via their own supply chain partners.

COUNTRIES OF OPERATION & SUPPLY

The Company currently operates in the United Kingdom excluding Northern Ireland.

The following is the process by which the Company assesses whether particular activities or countries are high risk in relation to slavery or human trafficking:

A review of our supply chain partners including their country source of materials and labour in support of our business operations. As we are operating exclusively in the UK with the majority of our supply chain partners also based in the UK, we consider the overall risk of slavery and/or human trafficking to be very low.

For all employees, we carry out Right to Work in the UK checks and pay minimum wages or above in accordance with published UK government legal guidelines in respect of National Minimum and National Living Wage.

POLICIES AND CONTRACTUAL PROVISIONS

The approach of Comex 2000 to the promotion of human rights and ethical issues is contained within our company policies which include but are not limited to:

- Anti-Bribery and Corruption Policy
- Equal Opportunities Policy
- Disciplinary and Grievance Policy
- Dignity at Work Policy
- Health & Safety and Environmental Policy

Our policies apply to all individuals employed or engaged by Comex 2000.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains. If employees believe or suspect a breach or conflict has occurred or may occur, they must notify a member of the executive management team and HR immediately.

The Company is taking steps to ensure that any new agreements with suppliers include an express obligation for suppliers to comply with the Act, to implement due diligence procedures within its own supply chains and notify Comex 2000 in the event of any actual or potential incidence of modern slavery.

In the event of a breach of these provisions, the Company will seek to resolve any issues with its suppliers and it may also seek to terminate the relationship with the supplier where a resolution is not achieved.

This provision is regularly reviewed and relevant amendments made.

ASSESSING AND MANAGING RISKS

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation because of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

The board of directors has overall responsibility for ensuring that the Company's meets both its legal and ethical obligations.

The HR Department, along with other support service functions, will monitor the use and effectiveness of any policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery and carry out necessary internal audits. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with the company's zero tolerance policy.

DUE DILIGENCE

Comex 2000 have identified our subcontractors as the main area of risk and exposure to modern slavery. Where a supplier is considered "medium" or "high" risk, further investigation will be conducted to enable greater understanding of the possible risks associated with the supply chain and further actions put in place where appropriate.

In addition to carrying out due diligence exercise on existing suppliers, Comex 2000 is identifying measures that we will benefit from including development of supplier due diligence arrangements which form part of the onboarding processes.

PERFORMANCE INDICATORS

The Comex 2000 Board appreciates that the approach to combatting modern slavery will have to adapt over time in response to findings following the completion of various risk assessments. The Comex 2000 Board intend to monitor the following KPIs to measure how effective the processes have been:

- The number of employees who have received training on modern slavery risks
- The number of risk assessments carried out on our suppliers

This statement and policy has been approved on behalf of the Comex 2000 Board on 2nd July 2018.



Mark Philby
Managing Director