



# Modern Slavery & Human Trafficking Statement

**PM Group recognises that it has a responsibility to take a robust approach towards modern slavery and human trafficking. This statement sets out PM Group's actions to understand all potential modern slavery risks to its business and to put in place steps that are aimed at ensuring there is no modern slavery or human trafficking in its own business and its supply chain. This statement relates to actions and activities during the financial year 01 Jan 2019 to 31 Dec 2019.**

## Our Business

PM Group is a 100% employee owned international project delivery company operating across Europe, the USA and Asia. We have a 47 year track record in project management, process design, facility design and construction management for leading multinational companies. We are leaders in the pharmaceutical, food, mission critical, medtech, advanced manufacturing and energy sectors.

## Our Policies

PM Group is committed to implementing and enforcing effective systems and controls to ensure that there is no modern slavery or human trafficking in any part of our business or in our supply chain.

PM Group is committed to complying with relevant policies including:

- *Modern Slavery and Human Trafficking Statement*
- *Human Rights policy*
- *Equal Opportunities policy*
- *Dignity at Work policy*
- *Code of Ethics policy*
- *Confidential Disclosure policy*
- *Sustainable Procurement policy*

## Assessment of Supply Chain

PM Group will not use the services of suppliers who have links to modern slavery and human trafficking. As part of this commitment PM Group undertake due diligence when considering taking on new suppliers and regularly review our existing supply chain.

PM Group's due diligence includes:

- A robust and auditable supplier pre-qualification and approvals process which evaluates the services of each long term and new supplier. The supplier pre-qualification assesses performance in the following areas; commercial, legal and ethics; health, safety, environment & quality; performance, expertise and experience. Each supplier is required to make a declaration of compliance with all relevant legislation that may be applicable to the services to be provided, including but not limited to the *Safety, Health and Welfare at Work Act 2005*, the *UK Health and Safety at Work Act 1974*, *UK Bribery Act 2010*, *UK Modern Slavery Act 2015*, the *Criminal Law (Human Trafficking) Act 2008*, the *Criminal Law (Human Trafficking) Act 2013* and *The Construction (Design and Management) Regulations 2015*. Where necessary or applicable, PM Group will arrange an inspection at origin that includes a section on facilities and policies in relation to slavery and the appropriate treatment to staff.

- Supplier compliance with the principles set out in the *Sustainable Procurement policy* is a required condition to inclusion on PM Group's Approved Supplier List. The principles consist of business conduct & ethics; health & safety; human rights & social impact; and the environment. Suppliers of goods or services to PM Group shall also ensure that their own supply chain complies with this policy.
- Reviewing on a regular basis all aspects of the supply chain.
- Invoking of sanctions against suppliers that seriously violate the standards and principles of business conduct as detailed in our *Sustainable Procurement policy*, including the termination of the business relationship.

*\*The term Supplier may be considered synonymous with Vendor, Contractor, Subcontractor or Sub consultant.*

## Approval

PM Group Directors shall be responsible for the application of this policy and ensuring all activities comply with the UK Modern Slavery Act 2015. PM Group will provide adequate resources, training and investment to ensure successful application of this policy throughout the next financial year.

Signed:



Dave Murphy  
Chief Executive Officer  
PM Group

Date: April 2020