

## Modern slavery statement

### Organisation

This statement applies to Soben (referred to in this statement as “the Organisation”). The information included in the statement refers to the financial year 2024.

### Organisational structure

Soben Group Holdings Limited, headquartered in Glasgow, is the UK parent company of the Soben family of companies. We have offices and operate in the Americas, EMEA and APAC regions. All directed by our CEO and supported by a global operations board and regional leadership teams.

Our global supply chain is comprised of contractors, service providers and suppliers of a variety of electrical and other products used in the delivery of professional services.

Soben is a global consulting firm providing effective and efficient solutions for every stage of a major construction project. Our people support the world’s largest organisations to be commercially successful as they deliver large scale and complex built environment projects. Demand for our services is consistently high throughout the year and is therefore not seasonal.

The labour supplied to the Organisation in pursuance of its operation is carried out globally including operations in the UK, the US, Mexico, Brazil, Chile, India, Sri Lanka, Australia, the Netherlands, Germany, Luxembourg.

### Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- child labour
- 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.

### Commitment

Soben acknowledges our 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 our internal practices in relation to our labour force and, additionally, our supply chains.

Soben 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 Soben in the pursuance of the provision of our 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 all countries that we are active, and generally exceeds those minimums in relation to our employees.

## Supply chains

In order to fulfil our activities, we expect our suppliers to:

- Comply with the provisions of the Act.
- Adhere to our commitment to a zero-tolerance approach to any form of slavery or human trafficking.
- Take steps to prevent modern slavery within their business and supply chains.
- Ensure that their employees are legally employed in the country(ies) they operate in and pay wages that meet the applicable local standards.

Our operations model means that we are generally able to conduct our own checks and identify any potential areas of concern and promptly address any issues.

## Potential exposure

In general, the Organisation considers its exposure to slavery/human trafficking to be limited due to our direct employment model. Nonetheless, we have taken steps to ensure that such practices do not take place in our business nor the business of any organisation that supplies goods and/or services to us.

## Steps

To prevent slavery and human trafficking within our organisation and supply chains, we conduct due diligence processes, including regular reviews of our suppliers' controls.

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 compliance with section 54(4) of the Modern Slavery Act 2015, our supplier contracts include clauses that allow for immediate termination if the supplier is found, or suspected, to be involved in modern slavery. We conduct ad-hoc audits of our suppliers' employment practices and require them to complete a self-assessment before entering into a contract with us. Additionally, we ensure that our managers and staff are properly trained in administering checks and controls related to modern slavery.

## Policies

The Organisation has the following policies which further define its stance on modern slavery: Supplier Code of Conduct, Human Rights and Modern Slavery Policy and our Recruitment 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 with regard to 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.

Date of approval:

Signed: 

Print name: Derek McFarlane

Job Title: Managing Director EMEA

Date: 5<sup>th</sup> September 2024