

Modern Slavery and Human Trafficking Statement

This statement of compliance with Section 54 of the Modern Slavery Act 2015, sets out the actions that Cilantro Engineering Ltd (referred to in this statement as “Cilantro”) has taken to ensure that modern slavery and human trafficking is not occurring in our organisation or in our supply chains.

The information included in this statement refers to the financial year ending December 2019.

Cilantro’s organisational structure, business, and supply chains

Cilantro is a leading mechanical and electrical engineering company operating in London and the south east construction sector. Cilantro is a privately-owned company and its business activities are primarily undertaken in the United Kingdom and more recently in the Republic of Ireland. It is appreciated that, whilst the company does not operate outside the British Isles, its major suppliers do and can source materials and/or manufacture products in a variety of countries round the globe.

Cilantro’s Supply Chain include the following:

- Sourcing of labouring through subcontractors;
- Recruitment Agencies;
- Suppliers of goods, services, and materials.

Definitions

Cilantro 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 of the treat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction place on freedom of movement.

Responsibilities under the Act

The Board of Directors and senior managers are aware of the problems of slavery and human trafficking, and the cost in human misery and lives, and are thus committed to ensuring that that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Cilantro understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally its supply chains.

Cilantro does not enter into business with any organisation, in the United Kingdom or in the Republic of Ireland or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided by Cilantro in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Cilantro strictly adheres to the minimum standards in relation to its responsibilities under relevant employment legislation in both the UK and the Republic of Ireland, and in many cases exceeds those minimums in relation to its employees.

It is the responsibility of all our personnel, though particularly those within the Procurement, the Commercial and the Recruitment Departments where supply chain facing, and vetting responsibilities are held, to maintain Cilantro's duties in respect of the Modern Slavery Act 2015.

Due Diligence

To ensure that no slavery or human trafficking is taking place within the Cilantros Supply chain, Cilantro shall:

- Ensure that all its employees are legally employed and are paid at least the minimum wage and have the right to work;
- Ensure working conditions are safe and hygiene and that working hours are not excessive;
- Ensure that our Sub- contractors are similarly compliant with their staffing;
- Include pre-contract checks with all new suppliers and sub- contractors to ensure compliance with this policy;
- Use our Suppliers/Sub Contractors Pre-Qualification Questionnaire to establish compliance in human resourcing;
- Conduct regular audits of existing suppliers and subcontractors;
- Use our Procurement Team to strengthen supplier engagement and maintain effective links with them, to ensure compliance with the UK Modern Slavery Act 2015 and any relevant Industry and International Standards;
- Publish the Policy on Cilantro's website for public access.

Training

All key personnel, particularly those involved directly in supply chains within Cilantro, have been trained to a high level of understanding of the risks of modern slavery in our supply chain and business. All Cilantro's Directors have been briefed on the subject.

The modern slavery policy has been communicated for all staff to read, and new staff are introduced to this policy as part of their induction.

This policy takes into account, and supports Cilantro's recruitment, procurement, grievance, antibribery and whistle blowing policies. Cilantro's corporate social policy and suppliers code of conduct also defines its stance on modern slavery.

The Cilantro Board of Directors have approved this statement policy.

Date of Approval: January 2019

Signed:

A handwritten signature in blue ink, appearing to be 'P. Gaynor', written over a light blue circular stamp or watermark.

Mr Peter Gaynor

Cilantro's Managing Director.