



## **Modern Slavery & Human Trafficking Compliance Statement January 2025**

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## 1. Introduction

At Advanté Limited (“**Advanté**”) we operate our business in a responsible manner and to the highest standards of business conduct in order to ensure compliance with all applicable laws and regulations. As such, we are committed to constantly improving our practices across our business and taking positive steps to combat modern slavery and human trafficking in our supply chains.

We acknowledge that slavery can occur in many forms, including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting. Whilst we have already taken steps to comply with the legal requirements to combat various forms of modern slavery, we continue to improve our governance framework and practices to prevent modern slavery. This statement presents the actions already taken and our continuous plans to address modern slavery.

## 2. Our Structure and Supply Chains

Advanté is a designer and supplier of self-contained welfare cabins in the UK. Our units are widely used primarily on construction sites across a wide range of sectors. We also provide lifting and transport services; from delivering welfare units or modular buildings, re-locating units and site accommodation, to moving heavy plant, large materials or unusual loads from site to site.

With our head office at 10/11 Argent Court, Sylvan Way, Southfields Business Park, Basildon, Essex SS15 6TH, Advanté operates from three service centres in England. We are a subsidiary of the Modulaire Group, which has over 4,800 employees and operates in 23 countries in Europe and Asia-Pacific.

Further details about Advanté can be found at: <https://www.advante.co.uk/> and our parent company, Modulaire at <https://www.modulairegroup.com/>

### Supply Chains:

Depending on the products or services, we engage with our suppliers through different forms, such as one-off purchases or long-term supply contracts. In the last 12 months we worked with 277 suppliers, of which 31 represented the top 80% of our spend (our “**Key Tier 1 suppliers**”). The majority of our suppliers are UK-based.

Most of our vendors and subcontractors broadly cover the following categories of goods and services:

- Materials for buildings, including steel components, walls and panels, solar panels, batteries, telematics, insulation, electrical components, plumbing supplies and flooring; and
- Sub-contract services for engineering and transport services.

### Relationships with bodies representing workers:

At Advanté, all employees have a voice through the following forums, which enable collaboration, progress initiatives and resolve issues raised by colleagues:

- Engagement Champions: this is a voluntary forum specifically focusing on active colleague involvement and engagement. It is an opportunity to share thinking, ideas, and opinions in a constructive environment to improve the colleague experience of working at Advanté.
- Bi-monthly All Hands meeting: all colleagues can attend the meeting to stay updated on business performance and progress and ask questions directly to senior leadership on any matters in the business. The meeting is a regular platform for open and two-way conversations between the leadership and everyone.



### 3. Policies on Modern Slavery & Human Trafficking

Advanté has a governance framework, which we continue to review and improve to monitor and address modern slavery. Our governance underpins how we conduct our business and interact with suppliers:

- Our Quality Management System (ISO 9001 certified) consists of policies and procedures related to human resources, health and safety, supplier management, and the Supplier Code of Conduct.
- We adopt our parent company's Supplier Code of Conduct, ESG & Sustainability Policy, Responsible Sourcing Policy, and Code of Ethics which reflect our commitment to acting ethically and with integrity in all business relationships.
- To ensure that those in our supply chains and our contractors comply with our values, from Q1 2025, we will require vendors to sign up to our Supplier Code of Conduct, including a commitment not to use slave labour or participate in human trafficking. We seek acknowledgement of signing up at the onboarding stage for our suppliers. In 2024, we rolled out a mandatory Responsible Sourcing Assessment with vendors who account for 90% of our spend.
- We nurture a transparent culture where anyone can raise concerns about our business without fearing retaliation. Our Speak-Up policy outlines how reports can be made and whistle-blower protections.
- In 2023, our parent company launched a Responsible Sourcing Policy and Guidelines, which apply to us. The policy and guidelines outline our requirements and procedure to collaborate with suppliers along the value chain, embed Environmental, Social, Governance and Sustainability (ESGS) at all stages, review ESGS performance as part of routine supplier relationships, improve our knowledge of the supply chains upon which we depend and drive continuous ESGS improvements.

Our policies are developed by respective business functions and also adapted from our parent company's policies. Our Managing Director is responsible for ensuring compliance with modern slavery and human trafficking policies in the business.

### 4. Due Diligence Processes for Slavery & Human Trafficking

Our governance framework enables us to review our suppliers' performance in ESGS continuously:

- Following our parent company's Responsible Sourcing Policy, we are rolling out a Responsible Sourcing Assessment with suppliers, who account for 90% of our spend. This helps us identify, assess and mitigate potential ESGS-risk areas in our supply chains.
- Our Responsible Sourcing Assessment has three questionnaire options, of which option three is an in-depth due diligence on an individual supplier. If we identify a supplier or single product from a high-risk sector or geography, we will use the in-depth due diligence questionnaire to assess their ESGS performance (which covers modern slavery & human trafficking).
- We are in the process of requiring our suppliers to sign up to our Supplier Code of Conduct and Responsible Sourcing Policy, which include the prevention of modern slavery;
- We protect whistleblowers through our Speak-Up policy.



## 5. Risk Assessment & Management

### Direct business operation:

Within our internal business operations, we consider the risk of modern slavery to be low. We monitor and mitigate this risk through our existing governance framework, and we comply with the relevant national labour legislation. We have policies and procedures relating to staff employment and their onboarding, including our approach to modern slavery and intolerance of any form of bullying or discrimination.

### Supply chain:

We can potentially be exposed to modern slavery risk if it is present in our supply chain. For example, goods from high-risk countries or base-skill workers engaged in high-risk category services such as cleaning or building maintenance. Based on our supply chain profile, the risk of modern slavery in direct suppliers remains relatively low. The main exception to this is our purchase of solar panels, where we recognise the modern slavery risk further up our supply chain (Tier 2 suppliers and further) where we have lower visibility and ability to influence. As a result, in 2024, we changed our solar panel suppliers, who do not source materials from high-risk countries.

### Actions taken to address and assess modern slavery risks:

To address and assess the risks of modern slavery in our business, Advanté has been undertaking the following actions:

- Starting to roll out a mandatory Responsible Sourcing assessment of our Key Tier 1 Suppliers, which covers modern slavery issues to assess our ESG risks in supply chain;
- Assessed modern slavery risks and kept our Board informed on the progress;
- Have in place a mechanism to allow people to safely report modern slavery risks in our business operations and supply chains through our whistleblower policy and whistleblowing hotline;
- Reviewed our purchase of solar panels to ensure there was no risk of modern slavery, following a collaboration with Action Sustainability (a Sustainability consulting organisation) on their new procurement guidance "Addressing Modern Slavery in Solar PV Supply Chains". As a result of implementing this guidance, we have changed supplier for solar panels on our product.
- Partly funded the production of the guidance "Addressing Modern Slavery in Solar PV Supply Chains", which focuses on solar PV, but its content is transferable to responsible sourcing strategies for other renewable energy technologies. It allows organisations to reduce reputational risk, meet client requirements, gain competitive advantage, increase investor confidence, and develop more resilient supply chains. As a result of following the guidance, the decision was made to change supplier for solar panels.
- Through our parent company, we recently provided Code of Ethics training (including modern slavery) to all employees with access to email. The training focuses on improving our employees' understanding of the impacts and risks of modern slavery in operations and supply chains;
- Ensured appropriate recruitment processes and procedures were in place, including conducting eligibility to work checks for all employees to mitigate against human trafficking or forced labour. The majority of our colleagues are employed on permanent or fixed-term contracts; however, when temporary staff are needed, Advanté only uses reputable employment agencies.



## 6. Performance Indicators

We have KPIs for our actions (e.g. training and suppliers' assessment) to address modern slavery within our business operations and across our supply chains. Aligning with our activities, our actions and KPIs related to combatting modern slavery are regularly reviewed at our parent company's Executive Committee and ESGS Committee to ensure we are on track.

In addition, our parent company is a signatory to the United Nations Global Compact ("UNGC") (<https://www.unglobalcompact.org/what-is-gc/participants/144802-Modulaire-Group>). The assessment framework and reporting/communications mechanism of UNGC also help us assess the effectiveness of our measures in addressing modern slavery. We report annually for UNGC's Communication on Progress.

We evaluated our actions in the following three areas:

**Governance & Due Diligence:** as described above in sections 3 and 4.

**Training:** as described below in section 7

**Continuous improvement of supply chain processes:** our parent company's Responsible Sourcing Policy and Supplier Assessment are part of our continuous improvement action to address modern slavery in our supply chains.

## 7. Training

Through our parent company, we recently provided Code of Ethics training (including modern slavery) to all employees with access to email. The training focuses on improving our employees' understanding of the impacts and risks of modern slavery in operations and supply chains.

## 8. Process of Consultation

We have brought this statement to the attention of our colleagues who work with suppliers, the ESG & Sustainability team and the HR team; we also allowed them to provide feedback, raise queries, and have such queries answered.

## 9. Others

Our Managing Director is a Board member of the Supply Chain Sustainability School, a not-for-profit coalition promoting Sustainability practices in supply chain across the construction industry. Her active role helps us stay learn from other organisations and quickly employ best practices to continuously improve our actions on the topic while also influence collaboration and best practices across the build industry to combat modern slavery.

## 10. This statement has been approved by:

**Name:** Mandy Messenger

**Position:** Managing Director

**Signature:**

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*Mandy Messenger*  
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