



OUTCO PEOPLE

MODERN SLAVERY STATEMENT

Outdoor Estate Compliance Experts



Modern slavery and human trafficking statement

INTRODUCTION

This statement sets out OUTCO's actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in our own business and our supply chains. This statement relates to actions and activities during the financial year 1 April 2022 to 31 March 2023.

As part of the outdoor compliance industry we recognise we have a responsibility to take a robust approach to slavery and human trafficking and we are committed to preventing slavery and human trafficking in our corporate activities, and to ensuring our supply chains are free from slavery and human trafficking.

SCOPE

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives.

ORGANISATIONAL STRUCTRE AND SUPPLY CHAIN

This statement covers the activities of OUTCO:

- Outdoor Estate Compliance Experts. We offer the UK's first end-to-end estate maintenance and compliance solution powered by smart technology. We provide a full range of grounds maintenance, surfacing, infrastructure, EV and winter services to our clients nationwide

COUNTRIES OF OPERATION AND SUPPLY

We currently operate in the following countries:

- United Kingdom
- Republic of Ireland

HIGH-RISK ACTIVITIES

The following activities are at high risk of slavery or human trafficking:

- Salt procurement – sourced through UK suppliers but initially transported from third world nations
- Labour procurement - internal markets

RESPONSIBILITY

Responsibility for our anti-slavery initiatives are as follows

- Policies: [Describe who is responsible for putting in place and reviewing policies and the process by which they were developed.]
- Risk assessments: [Explain the process and broad organisational responsibility for human rights and modern slavery risk analysis.]
- Investigations/due diligence: [List individuals or departments responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking and explain their specific role.]
- Training: [Describe broadly the training that has taken place either directly within the company, or with suppliers and others, to better understand and respond to the identified slavery and human trafficking risks.]

RELEVANT POLICIES

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing policy.** We encourage all our workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct.** Our code makes clear to employees the actions and behaviour expected of them when representing us. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.
- **Code of conduct.** We are committed to ensuring our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/agency workers] policy.** We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we use before accepting workers from that agency

DUE DILIGENCE

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- conducting supplier audits or assessments through, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans if required
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

PERFORMANCE INDICATORS

We have reviewed our key performance indicators (KPIs). As a result, we are:

- requiring all staff working high risk areas to have completed training on modern slavery.
- developing a system for supply chain verification whereby we evaluate potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains [whereby we evaluate all existing suppliers for compliance with company policies.

TRAINING

We require all employees staff/staff working in high-risk areas to complete training on modern slavery.

Our modern slavery training covers

- our purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation.
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative.
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

BOARD APPROVAL

This statement was approved on 08/11/22 by our [board of directors/members], who review and update it annually.

Director's/Designated member's/Partner's] signature:



Director's/Designated member's/Partner's] name:

Jason Petsch

Date: 28/11/22

Title	MODERN SLAVERY STATEMENT	Date Approved	08/11/22
Signed by	Jason Petch	Date of Review	01/11/23