



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Slavery and Human Trafficking Statement

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our corporate activities. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

This statement sets out ESS Modular actions to understand all potential modern slavery risks related to business and to ensure steps are maintained to prevent slavery and human trafficking.

Our business

ESS Modular design and build fast track construction projects using modern, innovative methods of construction that are safer, cleaner and more efficient than traditional construction. We provide professional construction management, guaranteeing our projects are delivered efficiently and within budget.

Our supply chains and supplier adherence to our values

The relationship with all our suppliers has been established over a number of years and is built upon mutually beneficial factors, where we have close and personal links and contact with the owners or directors, typically reflecting the fact that we partner with small and medium sized operations in the main.

As and when we have new contractors or suppliers come on-board we pre-qualify any new firm through a series of diligence, relating to company performance, HS&E compliance and references from other customers to establish that they are suitable.

To date we haven't been made aware of any human trafficking / slavery activities within the supply chain but if any were highlighted to us then we would act immediately in accordance with our legal and moral obligations.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

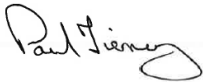
As part of our initiative to identify and mitigate risk, we have in place systems to:

- Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Training

We have zero tolerance to slavery and human trafficking. To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking in our business our Anti-slavery Policy is available on our internal filing system.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2016.



Paul Tierney, Managing Director

Date: 3rd May 2019

