

# MODERN SLAVERY STATEMENT

---

## A) ORGANISATION

This statement applies to UK Air Comms (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year 2021 / 2022.

## B) ORGANISATIONAL STRUCTURE

UK Air Comms is owned and managed by Bryn Harvey and Michael Kitchen (senior Management) from a single address / office Millstone Suite, The Old Corn Mill, Bullhouse Mill, Lee Lane, Millhouse Green, Penistone, Sheffield, S36 9NN

The business provides survey services in the mobile telecommunication infrastructure market and operates using directly employed field surveyors working remotely across the UK. All operations are directed from the Millstone Suite offices

Communication directly to each employee is made using a combination of email and mobile phone. A group company WhatsApp messaging is also used.

## C) DEFINITIONS

The UK Air Comms 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 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.

## D) COMMITMENT

The UK Air Comms acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The UK Air Comms understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The UK Air Comms 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 the UK Air Comms in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The UK Air Comms strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK

## E) SUPPLY CHAINS

To fulfil its activities, the Organisation’s main supply chains include those related to software developers and software platforms that are used for formatting survey results. These suppliers are direct into UK Air Comms and do not outsource beyond their own organisation.

## **F) POTENTIAL EXPOSURE**

In general, UK Air Comms considers its exposure to slavery/human trafficking to be none as it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

## **G) IMPACT OF COVID-19**

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation as it did for others across the nation.

UK Air Comms welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

The UK Air Comms concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above. During the pandemic UK Air Comms did not change suppliers and employed more staff to deal with the increased demand however this was done within the governments set guidelines at each stage.

During the pandemic, the Group's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, Group employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking. UK Air Comms took the decision from the outset of the pandemic to ensure that all the workforce who were required to self-isolate in accordance with public health guidelines continued to receive full pay during their absence.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

## **H) STEPS**

UK Air Comms carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

UK Air Comms has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, UK Air Comms has taken the following steps to ensure that modern slavery is not taking place:

- UK Right to work checks are taken for any new employee.
- Proof of ID is taken and recorded.

The above could include steps relating to:

- We review supplier contracts to include termination powers if the supplier is, or is suspected, to be involved in modern slavery.
- measures in place to identify and assess the potential risks in its supply chains.

**I) KEY PERFORMANCE INDICATORS**

UK Air Comms has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the UK Air Comms or its supply chains.

- UK Right to work procedure
- Onboarding of any new suppliers will require submittance of their own MSP

**J) TRAINING**

UK Air Comms provides the following training to staff to effectively implement its stance on modern slavery.

- As part of a new employee’s induction training
- Updates from Peninsula are circulated to all employees
- All employees have access to documents through Bright HR

**K) SLAVERY COMPLIANCE OFFICER**

UK Air Comms 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 UK Air Comms obligations in this regard.

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...05/02/2021


 A handwritten signature in black ink, consisting of a stylized 'B' followed by a horizontal line extending to the right.

Signed.....

Director

Date.....05/02/2021.....