



# Modern Slavery and Human Trafficking Policy

PM Group recognises that it has a responsibility to take a robust approach towards modern slavery and human trafficking. This Statement sets out PM Group's actions to understand all potential modern slavery risks to its business and to put in place steps that are aimed at ensuring there is no modern slavery or human trafficking in its own business and its supply chains. This Statement has been published in accordance with section 54 of the UK Modern Slavery Act 2015 and applies to the financial year ending 31 December 2022

### Our Business

PM Group is a 100% employee owned international project delivery company operating across Europe, the USA and Asia. We have a 50 year track record in providing architecture and engineering design, project management, construction management and consultancy services for leading multinational companies. We are leaders in the pharmaceutical, food, mission critical, medtech, advanced manufacturing and energy sectors.

### Structure of Supply Chain

PM Group's direct supply chain consists primarily of suppliers\* of equipment and consumable items supporting the ongoing operation of our offices as well as professional consultants to support the provision of our services to our clients.

*\*Throughout this document, the term Supplier may be considered synonymous with Vendor, Contractor, Sub contractor or Sub consultant.*

### Our Policies

PM Group is committed to

implementing and enforcing effective systems and controls to ensure that there is no modern slavery or human trafficking in our supply chain or in any part of our business.

PM Group is committed to complying with relevant policies including:

- *Modern Slavery and Human Trafficking Statement*
- *Human Rights policy*
- *Equal Opportunities policy*
- *Recruitment and Selection policy*
- *Dignity at Work policy*
- *Code of Ethics policy*
- *Confidential Disclosure policy*
- *Sustainable Procurement policy*

### Assessment of Supply Chain

PM Group will not utilise the services of suppliers who have links to modern slavery and human trafficking. As part of this commitment PM Group undertake due diligence when considering engagement with new suppliers and regularly review our existing supply chain. Further details on due diligence processes (including the supplier pre-qualification and approvals process) are included in the full Statement available on PM Group's management system.

### Risk Assessment & Management

In 2022, a Modern Slavery Working Group, was created which meets quarterly to progress our goals. In order to fully assess our risk, a mapping exercise has commenced of our existing direct suppliers. This will allow us to categorise our supply chain and identify any risks further down the chain. Once concluded, a full risk assessment will be conducted, and actions identified where necessary to reduce risk and ensure compliance.

### Measuring Effectiveness

Following the mapping exercise and risk assessment to identify any potential risks of modern slavery within our business and supply chain, we are currently developing a set of KPIs to monitor and report on the effectiveness of our policies and procedures governing modern slavery risks.

In the meantime, since the 2022 statement, no reported instances of Modern Slavery within the business or supply chain have been received.

### Training for Employees

Communication of this Statement

and the associated policies is important as they outline both employee and employer responsibilities to comply with the UK Modern Slavery Act 2015. Therefore, this Statement forms part of the standard PM Group on-boarding.

We conduct Employment Law training for our senior management, which includes a modern slavery awareness section. In addition, we have created a Toolbox talk on modern slavery, Gangmasters & Labour Abuse Authority for our site-based personnel so they can be vigilant to the signs and know where to report concerns.

In 2023 we plan to pilot specific training on modern slavery. We will be able to track training completion via our eLearning System as a KPI from the 2023 statement.

### Goals for 2023

Throughout 2023 PM Group plan to undertake the following activities:


- *Conclude mapping exercise and develop plan to assess risk as well as review our contractual obligations (where necessary)*
- *Continue to improve modern slavery awareness amongst senior management and anyone managing supply chains via e-learning.*
- *Develop KPIs to ensure effectiveness of our policies and procedures governing modern slavery risks.*

### Approval

PM Group Directors shall be responsible for the application of this Statement and for ensuring all activities comply with the UK Modern Slavery Act 2015. PM Group will provide adequate resources, training and investment to ensure successful application of this Statement throughout the next financial year.

This Statement was reviewed and approved by the organisation's UK Board of Directors; and is signed on behalf of the Board by:

Signed:



Dave Murphy  
Chief Executive Officer  
PM Group

Date: June 2023