

COU-POL-013
MODERN SLAVERY POLICY STATEMENT

Cousins Ltd recognises that the risks of modern slavery exist, and although we are not obliged under the scope of the Modern Slavery Act 2015 to publish a Statement, we are committed to ensuring that there is none within our business or within our sub-contractor network, and as far as is practical that our suppliers are also committed to its eradication.

Cousins Ltd is an SME working in the construction sector in the Southeast of the UK providing specialist painting & decorating services, and insurance repairs works. The business activities carried out by Cousins involve the deployment of trained and skilled staff and trade operatives, and personnel working on our behalf are selected based on their track record at delivering those activities. Trade operatives hold CSCS registration, and employment is freely chosen.

All managers in the business have a duty to ensure that we provide equality of opportunity throughout our recruitment and procurement functions, as well as in the day to day operation of our businesses.

Our commitment to treating people equally, including any issues of Modern Slavery, is stated in our Equality, Diversity & Inclusion Policy, which is published on our website and our intranet, and supported by our procedures relating to ensuring that we meet our compliance obligations under the Immigration, Asylum and Nationality Act 2006. To this end we are aligned with the aims of the GLAA (Gangmasters and Labour Abuse Authority).

Sub-contractors working for Cousins are required to complete a Pre-qualification procedure which ensures that we have a clear understanding of the structure and operating principles of their business. Sub-contractors working for Cousins are predominantly Small Businesses with high transparency in their staffing arrangements and the risk of modern slavery being present is considered to be minimal.

We recognise that our greatest risk is with our suppliers. Key suppliers of materials to our businesses tend to be large or global, and we look where possible for BES 6001 Responsible Sourcing of Construction Products Accreditation (or Equivalent) as verification that they have their own commitment to eradicating Modern Slavery. Materials are invariably specified by clients, and we expect clients to have undertaken their own due diligence when selecting products.

The likely incidence of Modern Slavery within our business is considered as being so slight that no measurement is practical.

Management staff are made aware of the general risks of modern slavery through induction training and the circulation of this Statement, which is published on our website and our Intranet.



T Wilkinson
Group Operations Director

05/01/2025