



Modern Slavery Statement

Message from the Chief Executive – SIS Group



As Chief Executive of the SIS Group, I am personally committed to ensuring the highest ethical standards and levels of integrity by which all companies and colleagues within the SIS Group carry out our business, wherever they operate throughout the world.

This includes ensuring best practice and transparency throughout the Group and our supply chain partners in relation to the recruitment, employment and treatment of workers throughout our industry. Slavery, servitude, forced labour and human trafficking are unimaginable but very real issues in today's world economy. It is wholly unacceptable that human beings are denied their freedom and treated as slaves in often appalling conditions.

It is the responsibility of all organizations, commercial and otherwise, to eradicate these illegal activities in the supply chain and I embrace the provisions of the UK Modern Slavery Act but, further, champion the promotion of best-practice working conditions and continual improvement of working conditions wherever possible.

Each SIS Group Company shall develop initiatives and strategies to prevent modern slavery and promote good working conditions in its business and supply chain.

SIS employees shall be provided with the right tools and knowledge to identify and avoid the risk of modern slavery and to report any concerns confidentially and without penalty.

I am pleased to endorse the SIS Group Modern Slavery Statement.

A handwritten signature in black ink that reads "George A. Mullan". The signature is fluid and cursive, written over a light grey background.

George Mullan - CEO



MODERN SLAVERY STATEMENT

Introduction

Modern Slavery and human trafficking are crimes resulting in the abuse of human rights. The Modern Slavery Act 2015 seeks to address the role of businesses in preventing modern slavery in their organizations and their supply chains.

As part of its core values, SIS is committed to developing, promoting and maintaining the highest possible ethical standards in relation to all its business activities, including the employment and treatment of its employees and workers in the Group supply chain. It has a zero tolerance towards slavery and is committed to the development and implementation of a balanced, proportionate and risk-based anti-slavery approach, to be inherent in the behaviour of all stakeholders through the adoption and ongoing review of robust policies and procedures, strategies and initiatives.

SIS Group (Ireland) Limited is the ultimate parent company of the SIS Group of companies. This organization is now required to comply with the Modern Slavery Act and produce and promote an annual statement regarding modern slavery because, as a body corporate, it:

- Carries on a business, or part of a business, in the UK;
 - Supplies goods or services; and
 - Has an annual turnover of £36million or more.
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Organizational Structure – Business & Supply Chains

The Support in Sport Group, more recently branded as SIS Pitches, is a world-leader in the manufacture of artificial grass surfaces for the residential and sports markets; and in the construction, installation and maintenance of sports pitches, using natural, artificial and hybrid grass surfaces.



SIS works with the biggest names in sport, including some of the most prestigious football and rugby clubs in the world, with a current order book that has included football pitch construction for the Football World Cup in Russia in 2018. SIS is a FIFA Licensee, a World Rugby preferred turf producer and a certified FIH manufacturer. In the UK, SIS is part of a capital investment framework with an agreement to design, manufacture, install and maintain sports pitches for the:

- Rugby Football Union
- Football Association
- Sport England
- England Hockey
- Football Foundation

SIS Head Office and manufacturing plant is in the UK, with operational bases in Maryport - Cumbria, Nottingham and Hinkley; but is a fully international business with companies and operational bases in Ireland, Netherlands, Russia, Turkey, Angola and the Middle East. As such, our human profile is diverse with a global employee pattern.

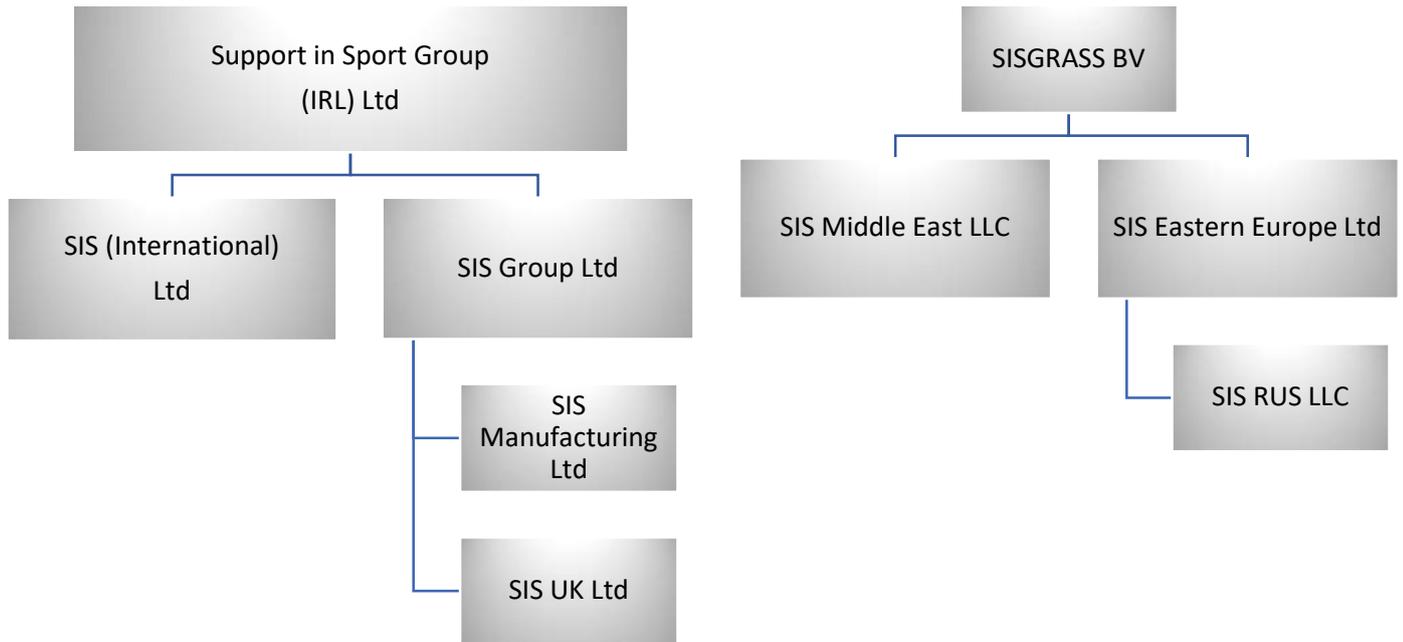
The Company organization structure is complex – see Figure 1 - although the business model is concise with a short chain of relationships from management to employees and workers and through to a primarily first tier supply chain.

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Figure 1



The countries that SIS operates in, through supply source or customer market are world-wide.

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Organization Policies & Operational Frameworks

SIS recognizes that the establishment and effective implementation of policies and operational frameworks can shape the environment and set the tone of an organization in assessing, preventing and mitigating the risk of modern slavery in the supply chain; and can promote continual improvement in labour relations, workplace conditions and worker reward within the organization itself. Clear policies and targets will demonstrate the commitment that SIS has in contributing to the eradication of modern slavery and the promotion of a safe, fair, and rewarding work environment for all employees and workers in the manufacture and use of artificial high-quality sports surfaces.

SIS has a number of policies which are relevant to Modern Slavery and is currently undergoing a fundamental review and development of its human resource policies under the framework of Corporate Social Responsibility.

Developments to date include:

- Equality & Diversity Policy
- Safeguarding Policy
- Anti-Bribery & Corruption Policy
- Pay Policy – UK Manufacturing workers pay rates now in excess of both the National Living (Minimum) Wage and the Living Wage set by the Living Wage Foundation
- Travel Policy - Home visits – migrant workers in UK now receive 4 trips home per year paid for by the Company
- Development of Daily Paid contracts to provide clarity of employment status for migrant workers in UK
- HR Department to provide focus and direction on human and employee rights
- Code of Conduct & Business Ethics/Ethical Business Policy
- Whistle-blowing Policy
- Recruitment Policy

Relevant SIS policies have been audited within the Manufacturing environment, together with general workplace conditions, working hours and employment terms and conditions under the WFSGI Social Audit.

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Improvement plans include the review or development of the following policies (which may be grouped together):

- Corporate Social Responsibility Statement
- Investigation into partnership with and/or membership of organizations for promotion of human rights
- Investigation into further CSR assessment or certification such as ISO 26001

Due Diligence & Risk Assessment

The manifestations of Modern Slavery can be complex and hidden and SIS recognizes that it can be too easy to assume such crimes do not exist in any particular supply chain.

As SIS has developed into a financially successful group of companies, it has recognized that due diligence and control processes must reflect the increasingly regulated and sophisticated market place.

Within the UK, SIS is certified to a number of management system standards including Quality, Health & Safety and Environmental management. These management systems involve controlled practices around risk assessment, monitoring, performance improvements and third-party auditing, which can be applied in principle to other risk control such as those risks around modern slavery.

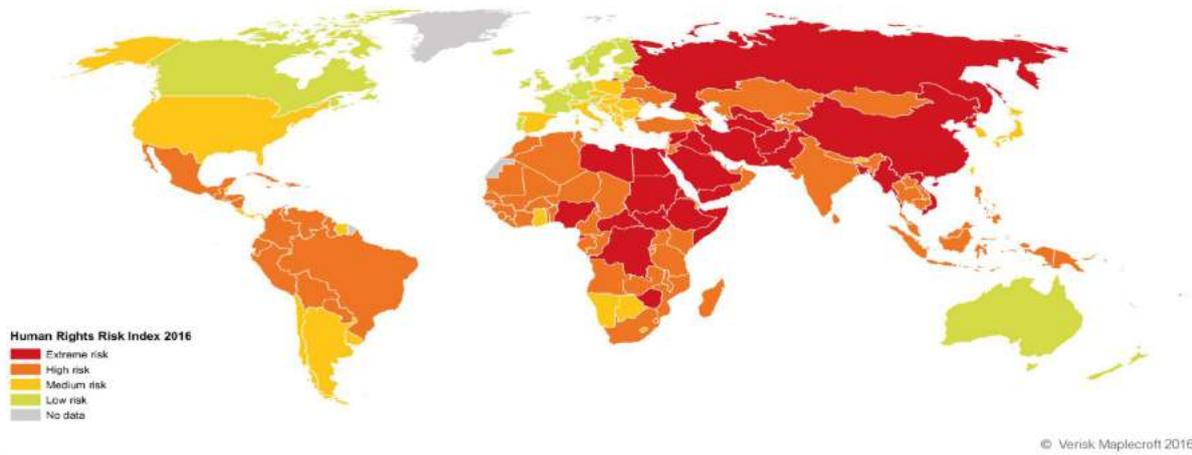
This level of management control and risk management needs to be rolled out across the Group as a whole and SIS is committed to assessing and controlling risks down the supply chain.

Figure 2 shows the world map indicating the countries of highest risk associated with modern slavery. SIS Group and its supply chain is operational in the highest risk areas and needs to apply transparent and sustainable diligence and control in its supply chain in these areas in a supportive but firm manner.

Figure 2

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Developments to date include:

- Social audit undertaken on UK Manufacturing Plant with a score of 100% in relation to labour working conditions
- Adoption of the WFSGI Pledge in the UK

Improvement plans may include the following in relation to due diligence and risk assessment:

- Roll-out of the Social Audit assessment to all UK companies and all Group companies which employ staff;
- Ongoing roll-out of HR policies relating to labour conditions at Group level wherever possible
- Development and roll-out of Supplier Declaration regarding Modern Slavery as a first step towards diligence and influence down the SIS supply chains, particularly with suppliers identified in the greatest country and sector risks

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Monitoring Effectiveness

It is recognized within SIS that a key component to any business management system is to monitor the effectiveness of that system in achieving the objectives, whether they relate to profit, business ethics or legal compliance. One way to monitor effectiveness is through the development and review of key performance indicators. SIS will review the KPIs already used in its business to identify whether any of them demonstrate where business objectives themselves may make the business vulnerable to modern slavery; and which KPIs could help demonstrate progress towards protection from modern slavery within the business and within its supply chain.

Key Performance Indicators which may be developed may include the following:

- Hours worked by SIS staff on a monthly basis – to ensure that the seasonal pattern of the business is controlled vs staff working time;
- Welfare inspections re staff living conditions where staff are working away from home;
- Social Audit performance scores, including number of corrective actions required;
- Number of assessments or compliance checks undertaken on suppliers in supply chain, including commitment statements re modern slavery;



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Training & Awareness

It is recognized within SIS that to effectively deal with any risk in a business or management system, including that of modern slavery and poor human rights, that our staff have to be aware of the risks, know what to look for, and then be trained in how to deal with and eradicate those risks.

All staff should know what their human rights are and how to uphold them and those of others in the workplace. This can, in turn, have business benefits in that employees shall develop a pride in being associated with an employer who has ethical standards, has concerns for their welfare and those of others. This will generate a more committed and co-operative workforce.

Training in relation to Modern Slavery can be direct and specific, but also part of training in a more general area such as recruitment or supplier negotiation.

SIS will commit to a training programme that incorporates awareness around Modern Slavery as follows:

- Awareness training to Group Management;
- Development of Recruitment Toolkits;
- Training of HR Team and how to develop cascade training;
- Induction Checklist and Training to include awareness of Modern Slavery Statement

Summary

The Board of Directors of SIS Group (Ireland) Limited are pleased to present this statement as the Modern Slavery Statement for the Group, to be reviewed on a regular basis.

The CEO commitment is fully endorsed by the Board which will fully support all Group companies in implementing initiatives which will ensure risks around, and vulnerability to, Modern Slavery within its business and its supply chain is identified, controlled within continual improvement in working conditions for all.

This statement was approved by the Board of SIS Group:

Signed: 

Date: 14 April 2022

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