

MODERN SLAVERY STATEMENT

A) ORGANISATION

This statement applies to Your Building Expert Ltd (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year 2021/2022.

OR

This statement applies to all companies within and associated to Hamburg Holding Ltd (referred to in this statement as ‘The Group’). The information included in the statement refers to the financial year 2021/2022.

B) ORGANISATIONAL STRUCTURE

The Business is organised in a 3 tier management structure with the Company Director - Peter Graf von der Pahlen and Company Secretary - Daniel James Shill acting as the senior principal management, based out of Your Building Experts central office in Swansea (226 Peniel Green Rd, Llansamlet, Swansea, SA7 9BD), in the mid tier are the business Managers and Team Leaders with the foundation of the business structure comprised of Office Workers and Construction trade-staff.

Hamburg Holding Ltd (Your Building Expert Ltd) operates solely and primarily in the United Kingdom and undertakes construction works across in comprising principalities, it's central catchment zone of principal staffing is based in the South Wales area with its operations centre being based in Swansea, Wales .

The organisation undertakes both Residential/Commercial works of varying sizes and site locations across the United Kingdom, the work is considered non-seasonal due to the business capacity to engage in a variety of contract scales and locations.

The labour supplied to the Hamburg Holding Ltd (Group) in pursuance of its operation is carried out in varying construction sites across the United Kingdom

C) DEFINITIONS

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

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

E) SUPPLY CHAINS

In order to fulfil its activities, the Group's main supply chains include those related to the supply of materials and tools in relation to the construction industry i.e. Residential/Commercial construction, The majority of our supply relationships are maintained on an ad-hoc (as per requirement) basis, with no contractual obligations and or partnerships maintained in regards to our supply chain requirements.

F) POTENTIAL EXPOSURE

The Group considers its main exposure to the risk of slavery and human trafficking to exist are the consistent use of sub-contractors whose workforce pool may be conceived in a manner not befitting the Groups mandates on slavery and human trafficking, that imported materials (Supply-chain) may inadvertently be sourced from a location/state where there is a high probability of breaches in regards to slavery and human trafficking.

In general, the Group considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, 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 Group, as it did for others across the nation.

The Group 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 Group 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. The reasons to be given but not limited to are the Governments guidelines in reducing the capacity of which the construction industry could maintain sites of works across the pandemic period of 2019/2020, this lead to a reduction in the Group supply-chain commitments and works engagement which the Group has deduced as a non-effective element to its risk assessing of its slavery and human trafficking policy.

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. During the applicable pandemic period the Group took the decision to furlough its staff under the Government furlough scheme in reducing the the physical and financial risk of the COVID-19 impact against the Group

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

H) STEPS

The Group 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.

The Group 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, the Group has taken the following steps to ensure that modern slavery is not taking place:

- Ensured that all staff current and during our recruitment cycle are processed via the appropriate right to work induction cycle.
- Terminating any supply chain relationship and reporting to the relevant regulatory and civil bodies any suspicion (verified or unverified) of slavery and human trafficking.
- Creating Actions plans in regards to identifiable instances of slavery and human trafficking

I) KEY PERFORMANCE INDICATORS

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

- Assessing ongoing Anti-slavery and human trafficking training and measuring the extent of which Group staff are undertaking said training.
- Assessing supply-chains and measuring the risks of interaction posed with the elements present in existing and potential supply-chains in regards to high-risk arrangements and reporting to senior staff and delegates.

J). TRAINING

The *Group* provides the following training to staff to effectively implement its stance on modern slavery Modern Slavery & Human Trafficking e-training via our Peninsula HR Platform (HR/Training Provider)

K). SLAVERY COMPLIANCE OFFICER

The Group 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 the Group 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.....26/11/2021.....



Signed.....

Daniel James Shill - Company Secretary

Date.....26/11/2021.....