



## **Warmworks Scotland LLP**

### **Modern Slavery Statement – Financial Year ending 31 March 2025**

#### **Modern Slavery:**

Modern slavery is the illegal exploitation of others. It is a violation of fundamental human rights and can destroy lives. Modern slavery can take many forms, including sexual exploitation, domestic servitude, forced labour and criminal exploitation.

The impacts of modern slavery can affect diverse groups of people, of any age or gender, and its effects can touch almost any industry.

Warmworks is committed to protecting the rights and freedoms of everyone within its organisation and its supply chain. We are aware of the problems that modern slavery brings, and the harm it causes, and will seek to eliminate these to the best of our ability.

Warmworks works with a diverse network of registered sub-contractors and suppliers and is seeking to put measures in place to ensure that we do not work with any companies that participate in or condone modern slavery.

#### **Who we are:**

Warmworks was founded in 2015 as a joint venture partnership between the Energy Saving Trust, Changeworks and Sureserve Energy Services, with the purpose of acting as the Managing Agent for the Scottish Government's national fuel poverty scheme. Under that scheme, Warmworks has now supported more than 45,000 households in Scotland to manage their energy usage and live in greater comfort.

In the spring of 2023, Warmworks was appointed by the Scottish Government to manage the successor to the Warmer Homes Scotland scheme, which will tackle fuel poverty and improve the nation's carbon footprint across Scotland to at least 2028.

Warmworks is an accredited Living Wage employer and has grown to the point where it now employs over 180 staff, based in offices in Edinburgh, London, Newcastle and Kirkwall. The organisation has been appointed as Managing Agent to other schemes across the UK.

#### **What we do:**

Having built up a wealth of experience administering the Scottish Government's national fuel poverty scheme, Warmworks is well-placed to administer this and other projects across the UK.

Warmworks manages these schemes, identifying and coordinating experienced and qualified experts to survey, design and install measures that will improve the energy usage of vulnerable homeowners and reduce CO2 emissions. These measures can include the installation of various types of insulation, solar panels and heat pumps.

Warmworks' growth and success are built on providing clients with a pool of registered, high-quality third-party sub-contractors. We manage their activities, so as to ensure the quality of the work, as well as sourcing the products and equipment that are needed to deliver on the goals of our clients.

### **Risk identification:**

Warmworks believes that the greatest risks associated with modern slavery and human trafficking in its business are related to the products in its supply chain and the third-party sub-contractors with which it works.

We are conscious that, whilst Warmworks purchases its products from UK suppliers, these suppliers will often inevitably have imported components from overseas. We are equally aware that there are well-founded concerns about the pay and working conditions of those involved in the manufacture of such components.

With respect to third-party sub-contractors, construction and associated activities are often seen as high-risk areas. Given the large number of surveyors, installers and other sub-contractors with which we work, we are, therefore, aware that this is another potential area of vulnerability, and is one on which we focus when considering our obligations in relation to modern slavery.

### **Our policies and procedures:**

Warmworks has a suite of policies that assist it, directly and indirectly, to address the risks associated with modern slavery. These include:

- ❑ **Modern Slavery Policy:** this policy sets out how Warmworks assesses the risks associated with its operations, and how it seeks to minimise and mitigate those risks, as well as the conduct, levels of awareness and values that employees should have.
- ❑ **Whistleblowing Policy:** this provides employees with a framework for reporting any wrongdoing or behaviour inconsistent with Warmworks' policies and values.
- ❑ **Disciplinary Policy;** and **Grievance Policy:** these policies set out how employees can raise concerns, and how Warmworks will deal with non-compliance with its policies.
- ❑ **Complaints Procedure:** this allows end users – those in whose homes Warmworks and our sub-contractors have worked on as part of the various schemes we manage – to raise any concerns they might have with the work or working practices they have witnessed.

### **Training:**

Warmworks ensures that all staff are given an induction, during which they are introduced to our policies and procedures. Inductions are tailored to the role that the new employee will be undertaking.

In view of the areas that Warmworks has identified as being the most high risk, specific training on modern slavery has been undertaken by selected staff involved in procurement.

### **Our suppliers:**

Warmworks takes an active role in assessing the ethical suitability in relation to modern slavery of the products that it uses in its projects. We are not content simply to assume that the UK importers from which we buy have done sufficient due diligence.

Warmworks undertakes an annual ethical procurement exercise, during which we assess manufacturers against a risk matrix, informed by our due diligence, and will avoid procuring materials from sources where the risk index is considered too high.

**Our sub-contractors:**

Warmworks works with a large number of surveyors, installers and other third-party sub-contractors. Warmworks ensures that legally binding contracts are in place before a contractor does any work and includes modern slavery clauses in all of its contracts. Breach of modern slavery clauses in contracts are grounds for immediate termination.

Sub-contractors are included as part of Warmworks' ethical procurement exercise, in which their compliance with standards relating to pay and working conditions are assessed and reviewed, allowing us to ensure that we only engage with sub-contractors that adhere to our values.

Since many of the end users with whom we work are vulnerable in some way, Warmworks often requires that its sub-contractors (including all staff within a company that will be engaging with a Warmworks project) undertake a criminal disclosure check. This process is also used as an indication that sub-contractors' staff have the legal right to work in the UK.

**Ongoing compliance monitoring:**

Warmworks' modern slavery policy has been reviewed and approved by Warmworks' Chief Executive. The policy will be reviewed at least annually, so as to ensure that it is operating effectively and fit for purpose.

**Approval:**

This statement has been approved by Warmworks' Chief Executive and (as an LLP) its members, the Energy Saving Trust, Changeworks and Sureserve Energy Services on 30 October 2024.



Ross Armstrong

Warmworks Scotland LLP Chief Executive