



28. Sub-contractor Policy

Review By: Melissa Munnich

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For our subcontractors and all 3rd party suppliers, we perform comprehensive background checks that encompass a range of enquiries to ensure they meet our high standards of integrity, professionalism, and reliability. This includes:

Verification of Business Credentials: Checking the legal status, business licenses, and professional certifications to ensure they are valid and up to date.

DBS Check: we use an external provider to perform a full background check on the contractor

Financial Health Assessments: Evaluating the financial stability of the subcontractor or supplier to mitigate the risk of disruptions due to financial instability.

Reputation and Reference Checks: Gathering feedback from previous clients and industry references to assess their track record, reliability, and quality of work.

Legal and Compliance History Review: Investigating any history of legal disputes, compliance violations, or regulatory issues that could impact their ability to deliver services effectively.

To oversee and ensure compliance with our sub-contractors, we implement a number of approaches:

Contractual Agreements: Our contracts with subcontractors explicitly outline compliance provisions, including standards for quality, security, data protection, and legal requirements. These agreements serve as the foundation for ensuring subcontractors understand and commit to our compliance standards.

Onboarding and Training Sessions: Upon entering into agreements, we conduct onboarding sessions for subcontractors, focusing on our company's compliance policies, ethical standards, and operational expectations. Training may be provided to ensure they are fully aware of their obligations under our contracts.

Performance Monitoring: We use project management tools and techniques to monitor the performance and compliance of subcontractors continuously. This includes tracking progress against milestones, quality of work delivered, and adherence to project specifications and compliance requirements.

Feedback Mechanisms: Establishing open lines of communication for feedback allows us to address any concerns related to compliance promptly. Subcontractors are encouraged to report any compliance issues they encounter, including those within their supply chain that may affect project delivery.

Remediation and Enforcement Actions: In cases where non-compliance is identified, we engage with the subcontractor to implement remediation measures. Persistent non-compliance may result in enforcement actions as outlined in our agreements, up to and including termination of the contract.

Continuous Improvement: We view compliance oversight as an ongoing process and seek to continuously improve our monitoring mechanisms and subcontractor engagements based on lessons learned and evolving compliance standards.