

Anti-Slavery & Human Trafficking Policy

We seek to promote an environment to work in that respects the rights of our employees. The purpose of this policy is to set out our responsibilities with regards to the prevention of slavery and human trafficking.

Modern Slavery is defined as the illegal exploitation of people for personal commercial gain. Victims are trapped in servitude, which they were deceived, forced or coerced into and cannot leave.

The construction industry is considered high risk due to:

- Critical worker shortages
- Complex supply chains with a lack of transparency
- Widespread reliance on subcontracting, temporary, agency and migrant labour
- Prevalence of low skilled and low paid roles
- Low profit margins and projects with tight deadlines

We will comply with the Modern Slavery Act (2015) and our values are:

- We pay our employees fairly and appropriately for their work.
- Enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.
- Acting ethically and with integrity in all our business relationships.

All employees are issued with a Contract of Employment of which they sign in agreement with the terms and conditions in place. Employees are free to terminate their Contract of Employment at any time as long as they adhere to the rules regarding the contractual notice period, as stated in their Contract.

All new employees also provide us with copies of their passports to ensure they are permitted to work and live within the UK.

We seek our materials and services from sources where they are not produced under conditions that involve the abuse or exploitation of any person's human rights. To ensure this, we issue document referenced DEL-IMS-213 which asks suppliers and subcontractors to confirm they are meeting our ethical standards in relation to the Modern Slavery Act (2015). Should suppliers/ contractors violate these rights and/ or are not willing to reach our standards, we will look to purchase materials elsewhere.

Possible signs of modern slavery may include:

- Discrepancies when checking identification documents
- Does the individual not have possession of their own passport
- Do earnings go into a bank account that is not in the employee's name
- Are they picked up by the same person everyday
- Does the individual show signs of poor personal hygiene
- Do they have signs of injury
- Do they have inadequate PPE

How to respond to a case of modern slavery:

- Call the police – 999 for imminent threat or 101 for a non-emergency
- Call the Modern slavery exploitation helpline – 08000 121 700
- Call the Gangmasters and Labour Abuse Authority (GLAA) – 0800 432 0804
- Do not approach the suspected victim directly, this could put them in danger

The purpose of this policy is to promote good labour in the workplace. It shall be communicated to all management and those personnel involved in the sourcing of materials.

This policy will be reviewed on an annual basis and amended as necessary.

Signed  **Date** 12/02/2026

Title Director