

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### Introductory Statement from Managing Director

Modern Slavery and human trafficking can take various forms including slavery, servitude, forced and compulsory labour, all of which have in common the deprivation of a person's liberty for personal or commercial gain. We maintain a zero-tolerance approach to these practices, and we remain committed to acting ethically, transparently and with high integrity in all our business dealings and relationships.

We expect the same high standards from all of our contractors, suppliers, and other business associates and we expect them to hold the businesses within their own supply chains to the same high standards.

### Our Supply Chain

It is widely acknowledged that the construction industry is a high-risk sector for modern slavery and human trafficking, largely due to the demographics of the temporary labour workforce and complex supply chains.

We aim to ensure that we only work with credible suppliers and contractors so as to limit the potential risk of slavery or human trafficking in our business and supply chain.

### Practices

We pay all of our directly employed workers at least the statutory UK National Minimum Wage or the UK National Living Wage (as applicable to the age of the worker).

We take steps to ensure that all our workers are eligible to work in the UK, either as part of our own recruitment process for directly employed workers or via our agency suppliers' processes. We also carry out DBS (Disclosure and Barring Service) checks and PVG (Protecting Vulnerable Groups) checks where statutorily required.

### Temporary Workforce

Our temporary site-based workforce is particularly vulnerable to the risk of modern slavery. We continue to be proactive in mitigating this risk by outsourcing the recruitment process of this workforce through a reputable third-party company. All agency suppliers are required to agree to comply with the Act and to give various assurances that their personnel and temporary workers are not victims of slavery or trafficking. Agency suppliers are also required to complete an annual questionnaire relating to obligations under the Act so that any inadequacies can be identified and addressed.

To further strengthen the assurances detailed above, we require the outsourcing partner to undertake audits on our labour suppliers to ensure that they also comply with the Act and pay our workers no less than the statutory UK National Minimum Wage or the UK National Living Wage (as applicable to the age of the worker) and that these pay rates are not reduced by the treatment of travel and/or subsistence expenses. These audits may take the form of an on-site or remote review of the records held by each labour supplier, including sight of workers' payslips, right to work documents and terms of engagement.

## Adherence

We expect our employees (whether permanent, fixed term or temporary), directors, casual and seconded staff, consultants, suppliers, and subcontractors to share our own ethics and values by complying with our Anti-Slavery and Human Trafficking Policy, Money Laundering and Terrorist Financing Prevention Policy, and our Anti-Bribery and Corruption and Fraud Policy.

We require suppliers and subcontractors to agree to representations and warranties contained in our standard Terms and Conditions, Subcontract Agreements and Framework Agreements relating to the prevention and detection of modern slavery and human trafficking. In addition, we require them to implement due diligence procedures within their own supply chains.

## Grievances or Complaints Received

There were no grievances or complaints related to modern slavery or human trafficking during the financial year end 31<sup>st</sup> April 2024.

We review all our policies annually.

Colin Jackson  
Managing Director



01/05/2024