

Anti-Slavery & Human Trafficking Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and we expect that our suppliers will hold their own suppliers to the same high standards.

In order to achieve this we:

- Ask all of our sub-contractors and other tradespersons engaged to confirm on an annual basis, via a questionnaire, that they are compliant with the Modern Slavery Act 2015
- Require all suppliers on an annual basis to confirm via return email, that they are compliant with the Modern Slavery Act 2015

In addition to annual confirmations, we will undertake proportionate, risk based due diligence to identify actual modern slavery risks in our operations and supply chains, reflecting updated Government guidance that organisations must report (or identify) real risks rather than assume or declare “zero risk”.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, director, staff, operatives, agency workers, seconded workers, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

The Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under his control comply with it. The Office Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems including the processes and procedures in place to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Office Manager.

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify the Office Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

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If you believe or suspect a breach of this policy has occurred or that it may occur you must notify the Office Manager as soon as possible. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



Gerald Ley
31 March 2026