

	Modern Slavery & Human Trafficking Policy			
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S&R Construction Ltd is committed to driving out acts of modern-day slavery, child labour and human trafficking within its business and that from its supply chains including sub-contractors and partners.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to modern slavery and human trafficking and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter these issues.

We will uphold all laws relevant to modern slavery and human trafficking in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Modern Slavery Act 2015, in respect of our conduct and that of all third parties that we interact with, both at home and abroad.

The purpose of this policy is to:

- set out our responsibilities, and of those working for us, in observing and upholding our position on modern slavery; and
- provide information and guidance to those working for us on how to recognise and deal with modern slavery issues.

Under law modern slavery and human trafficking are punishable for individuals including imprisonment and if we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

The operations of the company and this policy will be reviewed annually as a minimum or in light of changing company circumstances, procedures and statutes. These changes will be brought to the attention of employees and others whose health and safety may be affected by such changes.

This policy applies to all individuals working at all levels, including partners, consultants, employees (whether permanent, fixed-term or temporary), contractors, apprentices, casual workers and agency staff, volunteers, or any other person associated with us, wherever located (collectively referred to as workers in this policy).

The prevention, detection and reporting of modern slavery and human trafficking 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 your line manager OR a company Director 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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You are encouraged to raise concerns about any issue or suspicion of modern slavery or human trafficking in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director OR report it in accordance with our Whistleblowing Policy as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director.

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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.

If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your manager.

The company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and all third parties with which it interacts.

To this end:

- We will assess and address the risks linked to modern slavery and human trafficking (i.e. high-risk sectors, lack of regulation in source countries, complex employment arrangements, presence of vulnerable workers, absence of worker representation and rights). We will monitor and evaluate all measures in place.
- We will capture evidence of, and findings from engagement with people potentially or actually affected by Modern Slavery or Human Trafficking and pass this to the appropriate authorities. To date we have not identified any instances of Modern Slavery or Human Trafficking.



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- We will embed respect for human rights and zero tolerance of modern slavery and human trafficking across the business.
- Our Recruitment / On-boarding process includes stringent eligibility checks to ensure that all employees have the legitimate right to work in the UK.
- As part of the company's due diligence processes into slavery, child labour and human trafficking the supply chain approval process will incorporate a review of the controls undertaken by our partners and the requirement to sign up to our Code of Practice for Suppliers and Subcontractors.
- The company will not support or deal with any business knowingly involved in slavery, child labour or human trafficking.

The Directors and Senior Management shall take responsibility for implementing this policy to ensure that slavery, child labour and human trafficking is not taking place within the organisation.

A full copy of this policy is accessible electronically to all employees and is available from the SHEQ Department on request. It is also available on the company website.

This Policy will be reviewed annually and fully supports the policies and procedures within our Management System.

Signature:

Steven Sankey, MD