



Anti-Slavery & Human Trafficking Policy – 2025 - 2026

Anti-Slavery & Human Trafficking Policy

1.0 Policy Statement

1.1 Modern slavery can take various forms, such as, servitude, forced or compulsory labour and human trafficking. The Company adopts a zero-tolerance approach to modern slavery and any such criminal activity.

1.2 In addition to this, we are also committed to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within our business or supply chains which are consistent with our obligations under the Modern Slavery Act 2015.

1.3 This is reflected in every aspect of the way we operate the business, through the commitment to the prevention, deterrence, and detection of such acts.

1.4 The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery and expects that its suppliers will in turn hold their own suppliers to the same standards.

1.5 We therefore take very seriously the effective prevention of slavery and human trafficking and will not tolerate this in any form. As well as being illegal, slavery and human trafficking are damaging to all parties who engage in them.

1.6 This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, which includes Directors, employees, sub-contractors, agency workers, agents, contractors, consultants, and business partners etc.

1.7 Any breach of this policy will be regarded as a serious matter and will result in disciplinary action to the individual(s) concerned or if a subcontractor through the 'red / yellow' card system.

2.0 Responsibility

2.1 The Directors of the business have overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

2.2 The Operations Director has day-to-day responsibility for the effective implementation of this policy through monitoring its use, its effectiveness and the auditing of internal management systems, policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery.

2.3 The Directors also have the responsibility for investigating any allegations of modern slavery in the Company's business or supply chains.

2.4 The appointed Site Managers / Supervisors are responsible for ensuring that those reporting to them understand and fully comply with this policy.

3.0 Compliance

3.1 The prevention, detection, and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of **all** those working for the Company or under the Company's control. All individuals are required to avoid any activity that might lead to a breach of this policy.

3.2 Where an individual believes or suspects a breach of / or conflict with this policy has occurred or has the potential to occur, they must notify their site manager, supervisor or report it in accordance with the Company's Whistleblowing Policy.

3.3 All individuals are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. Where the individual is unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, they are to raise the matter with their site manager or supervisor. In addition, they can also contact the government's Modern

3.4 Slavery Helpline on 0800 0121 700 or visit www.modernslaveryhelpline.org for further information and guidance.

3.5 The Company aims to encourage openness at all times and will support anyone who raises genuine concerns in good faith under this policy. The Company is committed to ensuring no individual suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

4.0 Communication & Awareness

4.1 Effective training on this policy will be undertaken annually and on the risk our business faces from modern slavery in its supply chain so that individuals know how to identify exploitation, modern slavery and how to report suspected cases.

4.2 The Company's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5.0 Breaches of this Policy

5.1 Any individual working for the Company no matter in what capacity who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct or the 'red / yellow' card system.

5.2 The Company may terminate its commercial relationship with suppliers, contractors, and other businesses if it is found they are in breach of this policy and / or are found to have been involved in any act of modern slavery.

6.0 Declaration

6.1 This statement is made in accordance with the Company obligation to Section 54, Clause 5 of the 'Modern Slavery Act 2015' and constitutes the Company's slavery and human trafficking statement for the financial year 6th April 2024 to 5th April 2025.



S Gallagher
Operations Director
SG Civil Engineering Ltd

6th April 2025