

Slavery & Human Trafficking Policy Statement

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, 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 have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our corporate activities. 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 all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

This statement sets out our actions to understand all potential modern slavery risks related to business and to ensure steps are maintained to prevent slavery and human trafficking.

Responsibilities

The Partners of Stainforth Construction LLP have overall responsibility for ensuring compliance with the Modern Slavery Act 2015 and for ensuring that adequate resources are available to implement and maintain effective anti-slavery controls throughout the business.

The Procurement Team, Commercial Team and Site Management Teams are responsible for implementing this policy, undertaking supplier due diligence, monitoring compliance, identifying modern slavery risks and reporting concerns.

All employees, subcontractors and labour providers are expected to support the prevention of modern slavery and report any actual or suspected instances of exploitation, forced labour, servitude or human trafficking.

Our supply chains and Supplier adherence to our values

The relationship with all our suppliers has been established over a number of years and is built upon mutually beneficial factors, where we have close and personal links and contact with the owners or Directors. As and when we have new contractors or suppliers come on-board, we pre-qualify any new firm through a series of diligence, relating to company performance, HS&E compliance, and references from other customers to establish that they are suitable.

To date we haven't been made aware of any human trafficking / slavery activities within the supply chain but if any were highlighted to us then we would act immediately in accordance with our legal and moral obligations.

Supply chain risk level assessment

Stainforth Construction LLP recognises that modern slavery risks may arise within both direct and indirect supply chains.

Particular attention is given to:

- Overseas manufactured products and materials.
- Labour-only subcontractors.
- Agency and temporary workers.
- Migrant workers.
- Low-skilled and low-paid labour sectors.
- Multi-tier supply chains where oversight may be limited.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Slavery & Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Supplier due diligence

As part of our commitment to ethical procurement, Stainforth Construction LLP undertakes appropriate due diligence before engaging new suppliers, subcontractors and labour providers.

These checks may include:

- Review of Modern Slavery Statements.
- Verification of compliance with the Modern Slavery Act 2015.
- Constructionline Gold and/or Common Assessment Standard accreditation.
- Right-to-work procedures.
- Recruitment practices.
- Ongoing supplier monitoring.

Where concerns are identified, further investigations may be undertaken before engagement proceeds.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Worker welfare and protection

Stainforth Construction LLP is committed to ensuring all workers throughout its operations and supply chain are treated fairly, with dignity and respect.

We seek assurance that:

- Workers retain possession of their own passports and personal documentation.
- Wages are paid directly to workers through recognised payroll systems.
- No recruitment fees are charged.
- Employment is entered into voluntarily.
- Workers are free to leave employment subject to their contract.
- Overtime arrangements are voluntary and appropriately remunerated.

Any evidence of exploitation may result in contract termination and referral to the relevant authorities.

Training

We have zero tolerance to slavery and human trafficking. To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking in our business our Anti-slavery Policy is available in our Employee Handbook and all staff have undertaken Modern Slavery training.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement.

Enhanced training and awareness

Modern slavery awareness is promoted through:

- Employee inductions.
- Site inductions.
- Toolbox talks.
- Pre-start subcontractor meetings.
- Management briefings.
- Refresher training.

The purpose of this training is to help employees identify warning signs and understand reporting procedures.

Reporting concerns

Any employee, subcontractor, supplier or member of the public who suspects modern slavery, forced labour, servitude or human trafficking within our business or supply chain is encouraged to report concerns immediately.

Reports may be made through:

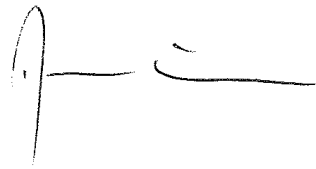
- Line management.
- Company Partners.
- The Company's Whistleblowing Procedure.

All reports will be investigated appropriately and treated confidentially wherever possible.

The Company will not tolerate retaliation against anyone who raises a genuine concern in good faith.

Related policies and procedures

- Whistleblowing Policy
- Equality & Diversity Policy
- Recruitment Procedure
- Health & Safety Policy
- Supplier Approval Procedure
- Ethical Policy



Signed: Danny Wilson
Partner



Lee Barnes
Partner



Dean Slingsby
Partner

Date: 1st June 2026
Review date: 5th January 2027

Stainforth Construction's Slavery & Human Trafficking Policy

Acceptance by Subcontractor

I hereby confirm I have read and understood the contents of this document and confirm my agreement to same.

Print Name:

Company Name:

Date:

Signature: