



**MODERN SLAVERY AND HUMAN TRAFFICKING POLICY  
SME151**

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## **POLICY STATEMENT**

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 have a zero-tolerance approach to modern slavery and 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 as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, 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.

SME is committed to operating with integrity, transparency, and social responsibility. We recognise the significant issue of modern slavery and the importance of ethical trading in the global supply chain. As a UK-based construction company, we are dedicated to eradicating modern slavery in all its forms within our operations and supply chains.

Our Statement of Intent for Modern Slavery outlines our unwavering commitment to ensuring that our business activities and supply chains are free from exploitation and unethical practices.

We firmly believe in upholding the human rights of all individuals involved in our operations, including employees, contractors, subcontractors, and suppliers.

## **OUR KEY COMMITMENTS INCLUDE:**

### **Compliance with Laws and Regulations:**

We will comply with all applicable laws and regulations related to modern slavery and ethical trading, including the UK Modern Slavery Act 2015, and ensure our suppliers do the same.

### **Transparency and Accountability:**

We will maintain transparency in our business practices and supply chains. We will undertake thorough risk assessments to identify and address the risk of modern slavery and human trafficking within our operations.

### **Supplier Engagement:**

We will work closely with our suppliers, contractors, and subcontractors to raise awareness about modern slavery and provide support and training to help them understand and implement best practices in ethical trading.

### **Due Diligence:**

We will conduct due diligence on our supply chains to identify and assess potential risks of modern slavery and take appropriate steps to mitigate these risks. This includes evaluating the policies and practices of our suppliers and implementing corrective actions where necessary.

### **Worker Welfare:**

We will ensure the welfare of our workers by providing fair wages, safe working conditions, and respecting their basic human rights. We will not tolerate any form of forced labour, child labour, or exploitative practices within our workforce.

### **Continuous Improvement:**

We are committed to continuous improvement in our approach to combating modern slavery and promoting ethical trading. We will regularly review and update our policies and procedures to align with best practices and industry standards.

### **Reporting and Communication:**

We will communicate our efforts to prevent modern slavery and promote ethical trading internally and externally. We will publish an annual statement outlining the steps taken, progress made, and challenges faced in implementing our Modern Slavery and Ethical Trading Policy.

By adhering to this Statement of Intent, we pledge to contribute to the global fight against modern slavery, creating a fair, ethical, and sustainable construction industry in the UK and beyond. Together, we can make a difference and build a future where human rights are respected, and exploitation has no place in our society.

## CONTEXT OF SME

SME is a prominent UK-based construction company dedicated to delivering high-quality, innovative, and sustainable construction solutions. As a market leader, we understand the importance of aligning our operations with the dynamic business environment and regulatory framework. This document outlines the key factors that influence our organisation, helping us identify risks and opportunities, and enabling effective decision-making to achieve our strategic objectives.

Since SME was established, it has since grown into a reputable construction firm renowned for its expertise, reliability, and commitment to excellence. Our stakeholders include clients, employees, suppliers, regulatory bodies, and the local communities where we operate.

We closely monitor economic trends, market demands, and inflation rates to adapt our pricing strategies and financial planning accordingly.

Compliance with UK construction regulations, health and safety standards, and environmental laws is paramount to our operations. We proactively engage with regulatory bodies to stay updated on industry standards.

We leverage cutting-edge construction technologies and methodologies to enhance efficiency, quality, and sustainability in our projects.

We analyse competitors' strengths and weaknesses to identify market gaps and opportunities, allowing us to refine our services and remain competitive.

Understanding societal needs and cultural diversity enables us to tailor our projects to meet the specific requirements of different communities and demographics.

Our corporate values, ethics, and commitment to safety shape our organizational culture, fostering teamwork, innovation, and customer satisfaction.

We assess our human, financial, and technological resources to ensure they align with project demands and strategic goals.

Continuous improvement and adherence to international quality standards are integral to our construction processes, ensuring the delivery of exceptional results to our clients.

We prioritise the health and safety of our employees and stakeholders, implementing robust safety protocols and training programs to mitigate risks and prevent accidents.

Understanding clients' expectations and delivering projects that exceed their requirements is fundamental to our success.

Empowering and engaging our skilled workforce through training, development, and a safe working environment enhances their productivity and job satisfaction.

Collaborative relationships with reliable suppliers ensure the timely procurement of quality materials and services, enabling seamless project execution.

By comprehensively understanding the context within in which we operate, we are well-equipped to navigate challenges, capitalise on opportunities, and consistently deliver exceptional construction solutions.

This contextual awareness forms the foundation for our strategic planning, ensuring our continued growth, sustainability, and positive impact on the construction industry in the UK.

## **POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING**

SME prohibits all forms of modern slavery and human trafficking within its business operations and supply chains.

This includes slavery, forced labour, child labour, and human trafficking for any purpose.

SME respects the dignity and human rights of all individuals and expects the same from its employees, suppliers, and business partners.

SME does not accept child labour and works actively against it in support of the United Nations (U.N.) Convention on the Rights of the Child (1989) and the International Labour Organisation (ILO) Minimum Age Convention no. 138 (1973) and ILO Convention on the Worst Forms of Child Labour no. 182 (1999).

SME is against all forms of exploitation of children in any of its global operations and facilities and does not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities.

SME respects different cultures and values in countries where SME operates and sources its products but does not compromise on the basic requirements regarding the Rights of the Child.

Forms of child labour are considered but not limited to: any form of slavery (trafficking of children, debt bondage, forced and compulsory labour, use of children in armed conflict, prostitution, production of pornography etc.); the

use, procuring or offering of a child for illicit activities (trafficking of drugs); work that is likely to harm the health of the child

SME expects its suppliers, business partners and associates (collectively referred to as “Suppliers”) to have and uphold similar standards and abide by country-governing laws in countries wherein they operate. The violation of this principle will cause serious action, including discontinuation of the business relationship.

## **DUE DILIGENCE PROCESSES**

SME conducts due diligence processes to assess and address the risks of slavery and human trafficking in its business and supply chains. These processes include:

**Supplier Assessment:** SME evaluates potential suppliers and business partners to ensure they meet ethical standards, including a commitment to anti-slavery and human trafficking policies.

Regularly audit and monitor suppliers to ensure compliance with SME's standards and legal requirements.

Include anti-slavery and human trafficking clauses in supplier contracts, clearly stating the expectations regarding labour practices.

**Internal Audits:** Regular internal audits are conducted to assess the compliance of different departments and processes within SME.

Conduct regular internal and external audits of labour practices and supply chains to identify and rectify potential issues.

Utilise third-party auditors to assess the effectiveness of your anti-modern slavery initiatives and identify areas for improvement.

**Training:** Employees, suppliers, and business partners are provided with training to raise awareness about modern slavery and human trafficking issues.

Provide training to employees and suppliers about modern slavery risks, signs of exploitation, and reporting procedures.

Raise awareness about the issue within SME through workshops, posters, and internal communication channels.

**Risk Assessment and Management:** SME identifies the parts of its business and supply chains where there is a risk of slavery and human trafficking.

Conduct thorough risk assessments of suppliers, subcontractors, and labour agencies. Identify high-risk areas and assess each supplier's adherence to ethical labour practices.

This risk assessment includes: High-Risk Areas: Identification of high-risk areas within the organization's operations and supply chains.

**Assessment Methods:** The Organization employs various assessment methods, such as site visits, supplier questionnaires, and third-party audits, to evaluate and manage the risks.

## **AT RISK SECTIONS OF THE BUSINESS**

In a construction company, several parts of the business and supply chains could be at risk of modern slavery and human trafficking. These risks often vary based on the specific operations, location, and complexity of the supply chains. Here are some common areas within our company where modern slavery risks might occur.

**Raw Material Suppliers:** Suppliers providing raw materials such as steel, cement, and timber may have complex supply chains, making it difficult to trace the origin of materials. Subcontractors and suppliers within these chains might employ forced labour or engage in exploitative labour practices.

**Labor Recruitment:** Construction projects often require a large and diverse workforce. Workers might be recruited through agencies, labour brokers, or subcontractors. If proper due diligence is not conducted, these intermediaries could exploit workers, especially migrant workers who might be more vulnerable to exploitation.

**Subcontractors and Sub-subcontractors:** Construction projects involve various subcontractors, each having their own subcontractors and labour force. The deeper tiers of subcontracting can make it challenging to monitor labour practices, and exploitation might occur at these levels.

**Temporary and Seasonal Workers:** Construction projects may require temporary or seasonal labour. These workers, especially if hired informally, might lack legal protections and could be susceptible to exploitation.

**Low-skilled Labor:** Certain tasks in construction, such as manual labour and basic construction work, might attract low-skilled workers who are at higher risk of exploitation due to limited employment options and awareness of their rights.

**Infrastructure Projects in High-Risk Areas:** Construction projects in regions or countries known for human rights violations, political instability, or lack of labour regulations are at higher risk. Conflict zones or areas with weak law enforcement are particularly susceptible.



**Transportation and Logistics:** The transportation of construction materials and goods involves various intermediaries. Truck drivers and logistics providers could be vulnerable to exploitation, especially in cases where they are subcontracted through layers of intermediaries.

**Administration and Support Services:** Even within SME's own offices, there could be risks, especially if SME relies on outsourcing services like cleaning or security. If these services are outsourced to unscrupulous providers, there might be risks of exploitation within these functions as well.

**Social and Affordable Housing Projects:** Construction companies involved in social or affordable housing projects might engage suppliers and contractors who exploit vulnerable workers due to the cost pressures associated with such projects.

It's important for our company to conduct thorough risk assessments, especially in these areas, to identify and mitigate the risks of modern slavery and human trafficking within their operations and supply chains.

This assessment should extend to both domestic and international operations, considering the global nature of many construction supply chains.

## **EFFECTIVENESS AND PERFORMANCE INDICATORS**

SME measures its effectiveness in ensuring that slavery and human trafficking are not taking place within its business and supply chains. Performance indicators include:

**Compliance Rate:** Percentage of suppliers and business partners compliant with anti-slavery and human trafficking policies.

**Incident Reports:** Number of reported incidents related to modern slavery and human trafficking within the organization and its supply chains.

**Training Effectiveness:** Evaluation of the effectiveness of training programs on modern

## **RESPONSIBILITY FOR THE POLICY**

The directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The directors have 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 and procedures to ensure they are effective in countering modern slavery.

Line managers 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 person responsible for this policy.

## **COMPLIANCE WITH THE POLICY**

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 your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery 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 manager or report it in accordance with our Whistle-blowing Policy as soon as possible.

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 manager or Head of Procurement.

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 the Head of Procurement immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our 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.

## BREACHES OF THIS POLICY

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.

Practices that create risk of modern slavery occur at any point in the employment cycle, including recruitment, employment and exit.

Recruitment	Employment	Exit
Workers charged illegal or excessive recruitment fees	Underpayment of wages, delayed or withheld wage payments or excessive or illegal wage deductions	Worker's visa and work permit is tied to a single employer
Workers uninformed or misinformed about terms of employment	Identity documents and passports confiscated or withheld	Monetary penalties or withholding of wages for early contract termination
Workers not provided with understandable, legally compliant written contracts	Workers required to stay in company- or broker-controlled housing and unable to enter or leave the premises freely	Undocumented migrants threatened with notification of authorities if they leave employment
Multiple labour brokers and agents from recruitment to employment	Physically abusive or humiliating discipline and termination practices	Workers forced to pay financial deposits or 'security' fees as 'runaway insurance'
Fraudulently charging fees for travel, health checks, or work documentation	Working excessive overtime beyond legal or code of conduct limits	

## **REPORTING MECHANISMS**

Employees, suppliers, and other stakeholders are encouraged to report any concerns related to modern slavery and human trafficking. SME maintains confidential reporting mechanisms to enable individuals to report suspicions without fear of retaliation.


Non-compliance with this policy will result in disciplinary action, which may include termination of employment or termination of business relationships with suppliers and partners involved in modern slavery or human trafficking.

SME is committed to continuously improving its efforts to prevent modern slavery and human trafficking.

Regular reviews of this policy and associated processes are conducted to ensure their effectiveness and compliance with legal requirements.

### **Issued for SME Building Services Ltd**

Signature for SME Building Services Ltd

Signature: 

Name: Mr. Danny Denvir

Position: Director

Date: 1<sup>st</sup> August 2025

Planned Review: 1<sup>st</sup> August 2026

The review period is a maximum of not more than 12 months