

MODERN SLAVERY POLICY AND SUPPLY CHAIN STATEMENT

POLICY — COMPANY FILE

The policy, the supply chain checks, the signs on site and who to report to

KD-PQ-MS-004 Rev A0

Modern Slavery Act 2015 s.54: a commercial organisation — a company or partnership carrying on a business, or part of one, in any part of the UK — that supplies goods or services and has a total turnover of not less than the amount prescribed by regulations — £36 million, counting the turnover of its subsidiary undertakings — must prepare a slavery and human trafficking statement for each financial year. The board of directors (or the equivalent) must approve it and a director sign it; it is published with a link in a prominent place on the website homepage, or, with no website, sent within 30 days of a written request. Most small and medium contractors are below the threshold and have no duty to publish — but pre-qualification still asks what they do, and section 1 records which applies. The offences — slavery, servitude and forced or compulsory labour (s.1) and human trafficking (s.2) — are in Part 1, which extends to England and Wales; Scotland and Northern Ireland have their own equivalent offences, and the s.54 duty applies across the UK. Right to work checks are recorded on KD-HR-RW-001; the questions asked of subcontractors are KD-SUB-PQ-001.

1 THE BUSINESS AND THE SECTION 54 TEST

BUSINESS NAME	COMPANY NO.	PEOPLE EMPLOYED	POLICY DATE	YOUR REV
REGISTERED / TRADING ADDRESS	POLICY OWNER (DAY TO DAY)		REVIEW BY	
TOTAL TURNOVER, LAST FINANCIAL YEAR £	SECTION 54 STATEMENT REQUIRED?	STATEMENT PUBLISHED AT		

2 POLICY

This business will not tolerate slavery, servitude, forced or compulsory labour or human trafficking in its own work or in its supply chain. We pay the people we employ what they are owed, directly into their own bank accounts; we do not hold anyone's passport or identity documents; we do not charge anyone a fee to get or keep work; and we expect the same of every subcontractor, labour supplier and supplier we use. If we find it, we report it and we protect the person, even where that costs us the job.

3 WHERE THE RISK IS FOR THIS BUSINESS

THE PARTS OF THIS BUSINESS AND ITS SUPPLY CHAIN WHERE EXPLOITATION IS MOST LIKELY

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4 SUPPLY CHAIN CHECKS — TICK WHAT THIS BUSINESS DOES

- ☐ Right to work checked for every person we employ, before they start — recorded on KD-HR-RW-001
- ☐ Labour suppliers and agencies confirm in writing that they check right to work, pay the workers directly and charge them no fees; identity checked against the person at induction (KD-CDM-IN-009)
- ☐ Subcontractors asked how they check right to work and whether they subcontract — KD-SUB-PQ-001 questions 7.1 and 7.4
- ☐ This policy issued with every subcontract and supply order; for high-value or high-risk supplies, the supplier's own statement or policy obtained
- ☐ Site managers and supervisors briefed on the signs in section 5, and told who to tell
- ☐ No worker on our sites paid in cash through a third party

CHECKS NOT MADE — AND WHY

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5 SIGNS TO LOOK FOR ON SITE — NONE PROVES EXPLOITATION; EACH IS A REASON TO ASK AND TO REPORT

Operatives who do not hold their own CSCS card, passport or identity documents, or look to someone else before answering a question · one person collecting everyone's wages, or pay in cash from someone who is not the employer · a gang whose members all give the same address, arrive in one overloaded van and are collected together · first on site and last off every day, with no rest days · talk of debts owed for travel, housing or getting the job · no contract, and no PPE, work clothing or training for the work · someone who seems frightened or withdrawn, or is never left on their own · injuries that have not been treated.

Adapted from gov.uk guidance on reporting labour exploitation, which contains public sector information licensed under the Open Government Licence v3.0.

6 REPORTING A CONCERN

Tell the site manager or the named person below the same day. Do not confront the person suspected of exploiting anyone, and do nothing that puts the worker at greater risk. If someone is in immediate danger, call the police on 999. Otherwise the named person reports to the police on 101, to the UK Modern Slavery Helpline on 0800 121 700 or online, or anonymously to Crimestoppers on 0800 555 111 — the routes gov.uk gives; check the numbers before displaying them. Nobody is treated less favourably for reporting a genuine concern.

NAMED PERSON	HOW TO REACH THEM	WHERE CONCERNS ARE RECORDED

7 WHERE A SECTION 54 STATEMENT IS REQUIRED

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continued

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The statement for a financial year is either a statement of the steps the organisation took during the year to ensure slavery and human trafficking was not taking place in its supply chains or its own business, or a statement that it took no such steps (s.54(4)). It may cover (s.54(5)): the organisation's structure, business and supply chains; its policies; its due diligence; the parts of the business and supply chains at risk and the steps taken to assess and manage that risk; its effectiveness, measured against indicators it chooses; and the training available to staff. Sections 2 to 6 of this sheet are the source for each.

FINANCIAL YEAR COVERED	BOARD APPROVAL — DATE	SIGNED BY (DIRECTOR)	HOME PAGE LINK CHECKED

8 RESPONSIBILITY, COMMUNICATION AND MONITORING

ROLE	NAME	WHAT THEY DO UNDER THIS POLICY

HOW THE POLICY IS COMMUNICATED

HOW IT IS MONITORED, AND WHAT TRIGGERS AN EARLY REVISION

9 SIGNED FOR THE BUSINESS

I adopt this modern slavery policy and supply chain statement for the business named in section 1, and I will make sure it is briefed, checked and kept up to date.

SIGNED — PRINTED NAME	POSITION	SIGNATURE	DATE	REVIEW BY

R REVISION HISTORY

Every revision of this document, and every review that found nothing to change. The revision on the front of this sheet is the one you are holding — check kubitdocs.com for the current one before use.

Rev	Date	Class	What changed	Authorised by
D0	2026-09-12	first-issue	First issue.	— not yet approved —
A0	2026-09-12	review	Approved for issue by the author. Content unchanged from the reviewed draft; the draft status strip is removed. No independent third-party review has been carried out.	Author — director, UK principal contractor, SMSTS. Not an independent review.

Class: first-issue · material (the law, a control, a field or the scope changed — past buyers are notified) · editorial (wording or layout only) · review (checked, nothing changed) · withdrawal. Revision prefix D = draft, not approved and not for sale; A = approved for issue by the person named, on the date shown.