

MODERN SLAVERY POLICY

At Sheet Piling (UK) Ltd we recognise that slavery and human trafficking are significant human rights issues and are committed to taking appropriate and proportionate steps to mitigating the risk of these occurring within our business and our supply chain. Sheet Piling (UK) Ltd has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain:

1. **Policy Development:**
 - Develop a comprehensive policy that explicitly condemns slavery and human trafficking.
 - Clearly communicate the policy to employees, suppliers, and other stakeholders.
2. **Risk Assessment:**
 - Identify and assess the potential risks of slavery and human trafficking in the company's supply chain and business operations.
 - Prioritize high-risk areas or suppliers for further scrutiny.
3. **Supplier Due Diligence:**
 - Implement a due diligence process for evaluating suppliers, including a review of their policies, practices, and adherence to ethical standards.
 - Consider using supplier questionnaires, audits, and certifications to ensure compliance.
4. **Contractual Obligations:**
 - Include anti-slavery and human trafficking clauses in supplier contracts, making adherence to these principles a contractual obligation.
5. **Employee Training:**
 - Provide training for employees, particularly those involved in procurement and supply chain management, to recognize and address issues related to slavery and human trafficking.
6. **Whistleblower Mechanism:**
 - Establish a confidential reporting mechanism for employees and suppliers to report any concerns related to slavery and human trafficking without fear of retaliation.
7. **Monitoring and Auditing:**
 - Regularly monitor and audit suppliers and internal operations to ensure compliance with anti-slavery policies and regulations.
8. **Remediation:**
 - Develop a process for addressing and remedying any identified instances of slavery or human trafficking promptly.
 - Work collaboratively with suppliers to implement corrective actions.
9. **Transparency and Reporting:**
 - Publish an annual Modern Slavery Statement detailing the steps taken to prevent slavery and human trafficking.
 - Comply with relevant legislation requiring disclosure and reporting.
10. **Collaboration and Engagement:**
 - Engage with industry associations, NGOs, and other stakeholders to stay informed about best practices and industry standards.
 - Collaborate with other companies to address common challenges and share insights.
11. **Continuous Improvement:**
 - Regularly review and update policies and procedures to adapt to changing circumstances and regulations.
 - Seek feedback from stakeholders to identify areas for improvement.

Sheet Piling (UK) Ltd recognises that areas of our work could be affected by slavery and human trafficking are our directly hired employees, potential agency workers working on our behalf, and the workforce of our supply chain who supply materials to our business. The steps that we take to mitigate risks in relation to each of these areas are as follows:

Employees:

- We verify that all employees have the right to work in the UK upon commencement of their employment.
- We make all employees aware of their working hours, leave and absence entitlements and other employment benefits via the Employee Induction Process.

Agency workers

- We aim to only engage agency workers that are provided by suppliers on our Preferred Supplier List.
- We require all Preferred Supplier List suppliers to: -
 - ensure their agency workers have the right to work in the UK
 - confirm that they do not charge workers a work finding fee
 - and to have procedures in place to minimise the risk of recruiting forced or compulsory labour.

Suppliers:

- We procure the majority of our directly sourced materials from UK based organisations that are required to comply with UK laws on forced labour however where materials are directly sourced from outside of the UK, we consider the risk of slavery and human trafficking as part of our selection process.

It's crucial for Sheet Piling (UK) Ltd to customize and continually refine its approach based on the evolving landscape of ethical sourcing and supply chain management. Additionally, staying informed about relevant legislation and global best practices is essential for maintaining a robust anti-slavery and human trafficking program.

Sheet Piling (UK) Ltd have additional supportive Policies that ensure our commitment to managing our responsibilities in line with the Modern Slavery Act.

The Construction Director is responsible for the contents of this statement, which will be reviewed and updated as necessary on at least an annual basis.

**Signed:****Andrew J. Foy – Director Responsible for Health, Safety & Environment****Date: 1st January 2024****Review Date: 01/01/2025**