



# Modern Slavery And Human Trafficking Statement

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Feb 2024

SDC Builders Ltd

We the Directors of SDC Builders Limited (the “Company”) recognise that we maintain relationships with many different organisations in our supply chain, as well as employing a large number of staff and utilising the services of agency workers and contractors. In the light of the general law on employment and human rights including the Modern Slavery Act 2015, we have reviewed our existing management processes to determine what measures already exist and what further enhancements we may need to put in place to prevent slavery and human trafficking taking place in any part of our business or in our supply chains.

Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking. All these forms involve the deprivation of a person’s liberty by another to exploit them for personal or commercial gain.

This statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf. We expect all who have, or seek to have, a business relationship with the Company to familiarise themselves with our anti-slavery values and documentation and to act in accordance with them at all times.

## Our Business Structure

Established in 1972 with our head office in Bedford, our core business is in construction in the United Kingdom. We have an international supply chain with direct sourcing by employees and indirect sourcing from our contractors. However, our supply chain is predominately sourced from the United Kingdom.

We undertake an annual risk assessment of the supply chains we use to ensure we have a consistent approach to the prohibition of modern slavery. We ensure our recruitment of staff and contractors is undertaken in a manner consistent with United Kingdom immigration legislation and with the Modern Slavery Act.

## Our Anti-Slavery Values

As part of our culture of good governance, we operate to a set of core values which reflect our relationships with our principal stakeholder groups: clients, consultants, contractors, suppliers and employees. Our values for all our business relationships reflect our attitude against the exploitation of individuals in any form and more particularly the offences under the Modern Slavery Act 2015.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

We will act ethically and with integrity in all our business activities. We will use reasonable endeavours to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

## Steps for the Prevention of Modern Slavery

1. We are determined to ensure that there is transparency in our own businesses and in our approach to tackling modern slavery throughout our supply chains. We expect these same high standards from all our contractors, suppliers and other business partners.

2. We have updated our supply chain due diligence process to ensure contractors are compliant with the requirements of the Modern Slavery Act.
3. We are evolving and updating our contracting processes in order that we can do what is reasonable to prohibit the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.
4. All our team members are obliged to familiarise themselves with our procedures to help us identify and prevent modern slavery.
5. We carry out our own recruitment process in a transparent manner consistent with the Modern Slavery Act verifying any recruitment agencies we use to ensure we adhere to all immigration rules.
6. Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in these chains. We will take reasonable steps to comply with these obligations but are not able to control our suppliers' activities if these are not disclosed to us. However, to underpin our compliance with practical steps, we intend to adopt the following measures:
  - I. conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
  - II. undertake audits of selected construction sites to ascertain whether modern slavery in any form is apparent.
  - III. engage with our suppliers to convey our anti-slavery values and to gain an understanding of the measures taken by them to ensure Modern Slavery is not occurring in their business.
  - IV. develop a Code of Ethics that contractors and suppliers will be required to sign up to as part of our pre-qualification process. The Code will outline our commitment to observing basic human rights and employment law in order to promote ethical behaviour across our business activities.
  - V. raise awareness of modern slavery amongst our staff by inclusion in inductions, site posters, toolbox talks and online training.
  - VI. provide further training to our staff, particularly those responsible for managing contractors on site.

## Responsibility

Ultimate responsibility for the prevention of modern slavery rests with the Board of Directors who have for a duty to ensure that this statement and its implementation complies with our legal and ethical obligations.

## Spotting the Signs

Indications of modern slavery and human trafficking can be difficult to spot. Some of the things to look out for include:

- Workers who don't have any written employment contracts.
- Workers who have to pay fees to gain work.
- Workers who are unable to prove they are legally entitled to work in the UK.
- A large number of people listed as living at the same address or having the same bank details.

- Agencies charging suspiciously low rates against industry standards.
- Workers who appear to have few personal belongings or often wear the same clothes.
- Workers who appear frightened or reluctant to talk to others.
- Workers with unusual travel arrangements, being dropped off and picked up by the same person regularly either very early or very late.
- Workers showing signs of physical abuse and may appear malnourished or unkempt.

## Actions to Report Modern Slavery or Human Trafficking

Our Public Interest Disclosure Policy (Whistleblowing Policy) is intended to provide guidance on how concerns can be communicated to the Company. If an employee has any concerns regarding suspected modern slavery associated with the Company or our suppliers, they should use the procedure outlined in the Public Interest Disclosure Policy to report it.

## Safeguards

We encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. We aim to ensure that 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. However any claims or allegations made which are found to be malicious will result in disciplinary action being taken against the individual.

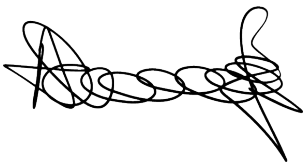
## Communication and Awareness

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship and reinforced as appropriate thereafter.

## Review

This Modern Slavery and Human Trafficking Statement will be reviewed by the Board of Directors annually or sooner if required.

## Signed



**Adam Knaggs**  
Managing Director



**Francis Shiner**  
Chairman



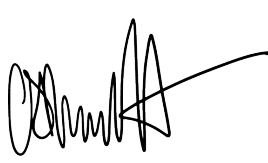
**Gary Wykes**  
Director



**Andrew Mitchell**  
Finance Director



**Andrew Shiner**  
Director



**Carl Bennett**  
Director



**Dan Changer**  
Director



**Jonathan Richardson**  
Finance Director

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