



## **Modern Slavery Policy Statement for the period ended 30<sup>th</sup> September 2022**

### **Introduction**

This Statement is for Sword Construction UK Ltd (referred to in this Statement as SCUKL).

SCUKL has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its 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.

### **Organisational structure and supply chains**

SCUKL is an established Civil Engineering Contractor operating within the United Kingdom, with one head office at The Old Brickyard, Island Carr Road Industrial Estate, Brigg, North Lincolnshire, DN20 8PD.

SCUKL offer a wide spectrum of Civil Engineering Services, specialising in the supply of labour resources, plant and materials for reinforced concrete works and associated activities.

Management of the Organisation is conducted from its head office in Brigg, however its work activities are carried out at various project locations around the UK.

The number of the Organisation's workforce fluctuates depending upon the number of projects that the Organisation is undertaking at any one time. The Organisation has a core workforce of approximately fifty, however can have a workforce of anything up to three hundred at any one time.

We buy a wide range of goods and services directly from suppliers and Contractors and do utilise from time-to-time sub-contract/agency labour.

All suppliers and Contractors are vetted to ensure suitability as per our ISO 9001:2015 accredited Management System.

SCUKL operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier.

### **Risk Assessment and Management**

The Organisation has undertaken a review of the evidence available of modern slavery relevant to its industry sector.

Construction was widely considered to be a high-risk industry, identified as an easily penetrable sector for criminals for several reasons; sub-contracting, temporary work, a complex supply chain and the employment of low-skilled, temporary, often foreign workers. All of which are common practices

which may make workers vulnerable to exploitation and the detection of potential Modern Slavery more difficult.

SCUKL's workforce is predominately skilled, sought after and as such are well paid. However some operations may need additional manual labour and it is possible that modern slavery practices may not be immediately visible in this supply chain.

SCUKL has accordingly had policies and procedures in place for a number of years in order to mitigate and reduce this risk.

## **Related policies and procedures**

SCUKL operates and has in place the following Policies, Procedures and Plans describe its approach to the identification of Modern Slavery and mitigation to prevent modern slavery and human trafficking in its operations and its supply chain.

- Modern Slavery (Anti-Slavery) Policy
- Sustainable Procurement Policy and Requirements
- Sword Code of Conduct
- Sword Sustainable Development Plan
- Business Ethics Policy including Whistle Blowing Policy
- Due diligence Procedure
- Corporate Responsibility Policy
- Recruitment Policy
- Policy on Proving Eligibility to work in the UK

## **Due Diligence**

SCUKL operates a supplier policy and maintains a preferred supplier list. Our approval Questionnaire includes relevant questions and considerations relating to modern slavery and human trafficking.

SCUKL further conducts due diligence on any labour only supplier in accordance with our Due Diligence Procedure before allowing them to become a preferred supplier. The due diligence procedure includes an ongoing audit process including ensuring compliance with minimum wages and benefits .

SCUKL ensures standard clauses on human rights and modern slavery are included in supplier contracts.

## **Effective actions and Performance Indicators**

SCUKL has taken steps to ensure that Slavery and/or human trafficking does not take place in its organisation or supply chain as above in:-

- implementing, monitoring and maintaining its Policies, Plans and Procedures
- carrying out Risk assessment and due diligence on its own activities and its suppliers

SCUKL has not received any reports of instances of modern slavery and has not to its knowledge conducted any business with another organisation which has been found to have involved itself in modern slavery.

SCUKL will continue to raise awareness of modern slavery and of the need for proper due diligence and risk assessment processes to be applied by staff and suppliers, in accordance with its policies.

SCUKL will continue to engage with, perform due diligence on and monitor its suppliers to mitigate the risk of slavery and human trafficking.

## **Training**

All SCUKL personnel, receive information instruction and training on Modern Slavery as part of their induction and refreshers take place minimum annually.

Training includes how to identify possible slavery and human trafficking, and what steps to take if slavery or human trafficking is suspected.

## **Board Approval**

This Statement is made with respect to the financial year ended 30<sup>th</sup> September 2022 in accordance with Section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board on 24<sup>th</sup> February 2023.

This Statement will be reviewed and updated as required annually to reflect SCUKL's ongoing commitment to ensuring that its organisation and its supply chain are free from slavery and human trafficking.

A handwritten signature in black ink, appearing to read "Melissa Sword".

**Melissa Sword**  
HSEQ Director  
24/02/2023