



# **Modern Slavery (Anti-Slavery) Policy**

**REVISION HISTORY**

<b>DOCUMENT TITLE:</b>	<b>MODERN SLAVERY (Anti-Slavery) POLICY</b>	<b>DOCUMENT NO:</b>	<b>MSPOL023</b>
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Revision	Author	Approved By	Date Approved	Reason For Revision
01	Melissa Sword	Ian Sword	01/10/2020	First Issue
02	Melissa Sword	Anil Patel	09/01/2023	Change in managing director
03	Melissa Sword	Anil Patel	24/02/2023	Updated to include referencing Policy Statement

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Review Date	Reviewed By	Status
30/09/21	M Sword	Current re-signed by MD but not reissued
20/06/2022	Ryan Rowbottom	Current
23/09/22	M Sword	Signed by MD
28/03/24	M Sword	Signed by HSEQ Director and to reference latest Policy Statement
28/03/25	M Sword	current
30/03/26	M sword	Signed by Managing Director and to reference latest Policy Statement

## Policy on Modern Slavery (Anti-Slavery)

### Introduction

Modern slavery is a crime and a violation of fundamental human rights.

It takes various forms, such as:-

**Slavery** - exercising powers of ownership over a person

**Servitude** - the obligation to provide services is imposed by the use of coercion

**Forced and compulsory labour** - work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily

**Human trafficking** - arranging or facilitating the travel of another person with a view to their exploitation

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.

Sword Construction UK Ltd has 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.

### Policy Statement

Sword has issued a separate Modern Slavery Statement for the Period to 30<sup>th</sup> September 2025.

### Scope

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), trainees, consultants, contractors, suppliers, sub-contractors, agency staff and any other person providing goods or services to us.

### Related policies and procedures

This Modern Slavery (Anti-Slavery) Policy interacts with the following workplace policies and procedures. You are encouraged to familiarise yourself with the policies detailed below.

- 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

## **Responsibilities**

Everyone to whom this Policy applies (see Scope) have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

Everyone must observe this Policy.

### **The Company**

We will:

- Maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- Examine our supply chains and be clear with key suppliers our expectations regarding the Act
- Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, sub-contractors etc to ensure we know who is working for us
- Ensure we have in place an open and transparent grievance process for all staff
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare

### **Managers**

Managers will:

- Listen and be approachable to colleagues
- Respond appropriately if they are told something that might indicate an individual is in an exploitative situation
- Remain alert to indicators of slavery (see Identifying slavery later)
- Raise the awareness and ensure all employees, contractors, sub-contractors and anyone providing any service for the Company are provided a copy of this policy and be aware of their responsibilities
- Use their experience and professional judgement to gauge situations

### **Supply Chain/Contractors/Sub-Contractors/Suppliers/Consultants**

They will:

- Abide by this Policy
- Ensure that they have appropriate policies and procedures in place preventing exploitation and human trafficking
- Ensure their staff are safeguarded, treated fairly and with dignity

### **Employees/Trainees/Agency Staff/Colleagues**

Everyone has a responsibility under this policy, whatever your role or level of seniority, you must:

- Keep your eyes and ears open
- If you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see later Reporting slavery)
- Follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated

- Tell us if you think there is more we can do to prevent people from being exploited.

## **Identifying Slavery**

There is no such thing as a typical victim and some victims do not understand they are being exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed, controlled or coached by someone else.
- They are dropped off and collected from work.
- They are not able to move around freely
- The person is withdrawn or they appear frightened.
- They wear the same clothes everyday
- The person has limited social interaction or contact with people outside their immediate environment.
- Be unpaid or paid very little.

This list is not exhaustive.

Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking.

## **Reporting**

If you have concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains report it to your Manager or the HSEQ/HR Manager 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 the HSEQ/HR Manager.

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.

## **Actions following a report**

The HSEQ/HR Manager will conduct an investigation in to the concerns raised and will take appropriate action depending upon the nature of the concerns raised and any risk posed to any individuals concerned and taking into account that often in cases where modern slavery is discovered, terminating a contract immediately can leave the victims even more vulnerable and at risk.

Where there is concern about a potential victim, or suspicion about a situation that potentially amounts to modern slavery, advice will be sought from the Modern Slavery Helpline 08000 121 700.

Where modern slavery is suspected, and it is suspected that someone is in immediate danger it will be reported to the Police.

Following advice from the Modern Slavery Helpline and where appropriate, possible and practical to do so, we will work with the supplier to put in place an action plan specific to the type of incident and to prevent recurrence once investigations have concluded. This action plan will at least set out:

- How to remediate the workers involved (this may include involving police and judicial system see later);
- A review of the suppliers' policies and systems to ensure that these are appropriate to prevent incidents from occurring in the future
- The introduction of credible, independent grievance mechanisms to mitigate any re-occurrence.

### **Communicating this policy**

Instruction, information and training on this policy and on the risk our business faces from modern slavery in its supply chains, will take place at Induction and at a minimum annually thereafter.

### **Monitoring and Review**

This policy will be reviewed at a minimum annually.



**Melissa Sword**  
Managing Director  
30/03/26