Introduction

This policy applies to all of the legal entities listed in the SP100 Business Entities document who shall be referred to in this policy as “we”, “us”, “our”.

Scope

We recognise that modern slavery is a crime and a violation of fundamental human rights. It has many different forms including slavery, servitude, forced and compulsory labour and human trafficking, 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.

Operating mainly in the Construction sector, we have a Zero Tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships to ensure that our supply chain is aligned with our obligations under the Modern Slavery Act 2015 or other applicable local legislation.

This policy applies to all those employed or working on our behalf, in any capacity, and includes (but not limited to) employees at all levels: directors, officers, temporary staff, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee’s contract of employment, and we may amend it at any time.

Responsibility

Whilst our Executive Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, General Counsel has primary responsibility in it’s implementation to ensure effectiveness in countering modern slavery.

Management at all levels share a responsibility for ensuring those reporting to them understand and comply with this policy. Appropriate and regular training is made available to assist all staff in identifying modern slavery, and to support any preventative actions.

This policy does not form part of any employee’s contract of employment, and we may amend it at any time.

Compliance

The prevention, detection and reporting of modern slavery in any part of our business, or supply chain, is a shared responsibility of all those working for us, or under our control.

If you believe or suspect that a breach (or possible breach) of this policy has occurred, or may occur in the future, you must report it to your line Manager or the HR department as soon as possible. This can be done in accordance with our GSP11 Whistleblowing Policy. We will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion of potential modern slavery in good faith across any part of our business or supply chain.

The Modern Slavery Helpline can also provide support, and can be contacted either by calling 08000 121 700, or via the website: https://www.modernslaveryhelpline.org/.

Risk Management

The following are indicators of forced labour as set out by the International Labour Organisation (ILO) form part of our risk management approach:

Abuse of vulnerability	Deception	Restriction of movement
Isolation	Physical and sexual violence	Intimidation and threats
Retention of identity documents	Withholding of wages	Debt bondage
Abusive working and living conditions	Excessive overtime	

Due to the sector we operate in, the potential risks of Modern Slavery within our supply chain can come from:

- Suppliers providing temporary labour for the delivery of our critical infrastructure safety works
- Labour used by suppliers for the manufacturing of business-related products such as office goods, Traffic Management equipment, PPE or digital etc

To support our employees in addressing modern slavery risks, we include:

- Mandatory modern slavery training for all employees
- Enhanced vetting and due diligence of our supply chain partners
- Initial signatories to the Gangmasters and Labour Abuse Authority Construction Protocol

Actions

We are committed to a zero-tolerance approach to modern slavery and will ensure compliance with this policy by:

- Providing annual training for all employees so that they understand what modern slavery is, and how to recognise the signs of it
- Enhanced vetting and reviews of our supply chain (contractors, sub-contractors, policies, contracts etc.)
- Raising awareness of modern slavery within our supply chain partners
- Carrying out regular internal audits as part of our Integrated Management System on both our own policies and procedures, as well as those of our Supply Chain
- Using labour monitoring and payroll systems
- Encouraging the reporting of concerns and the protection of whistleblower
- Not knowingly supporting or dealing with any business involved in slavery or human trafficking

Breach

Any employee found to be in breach of this policy will face disciplinary action up to, and including summary dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals, and organisations working with us or on our behalf if they are found in breach of this policy.

Review

We will regularly review the effectiveness of our policies and procedures on the basis of reports received, changes of regulation and legislation, changes of working practices and in any event at intervals not exceeding 12 months.

Communication

This Policy is communicated to all employees and is made available to our supply chain and other interested parties to inform them of our zero-tolerance approach to modern slavery and to promote wider adoption of responsible practices.

This policy has been prepared in accordance with Section 54 of the Modern Slavery Act 2015.

Adam Caulfield
President, Ramudden Global UK
25th August 2026