

P-04 – Modern Slavery and Human Trafficking Policy

Introduction

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps Deans Civil Engineering has taken to ensure that modern slavery and human trafficking is not taking place in its business or any part of its supply chain.

Deans Civil Engineering are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains. Deans Civil Engineering recognises that slavery and human trafficking can occur in many forms, such as 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.

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 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. This Policy sets out the actions that we have taken to understand all potential modern slavery risks related to our business and to implement steps to prevent slavery and human trafficking.

Our Business and Supply Chain

All Deans Civil Engineering's employees have a responsibility to comply with the Code of Conduct and be alert to the risks brought about by modern slavery in our business and the wider supply chain. Staff are expected to report any concerns and management are expected to act upon them.

Suppliers (including their subsidiaries or subcontractors) are expected to act in accordance with our Code of Conduct, or an equivalent of its relevant core principles, in the performance of any agreement. We establish a relationship of trust and integrity with all our supply chain, which is built upon mutually beneficial factors. Our supply chain selection and onboarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety, and environmental standards, and references.

Our recruitment processes are transparent and reviewed regularly. New employees are vetted to ensure that we are able to confirm their identities and that they are paid directly into an appropriate, personal bank account. We have implemented a number of processes to ensure, as far as reasonably practicable, that our supply chain adheres to our expectations in respect of their workforce.

Our verification process involves induction of all individuals prior to commencing works for Deans Civil Engineering, and / or going through Principal Contractor inductions on sites, stating that they are aware of the Modern Slavery and Human Trafficking Act 2015.

Where appropriate we require our supply chain to be either registered with Constructionline or have completed our pre-qualification process, in compliance with our Code of Conduct and Ethical Procurement Policy. These require our supply chain to demonstrate the steps taken to ensure that modern slavery and human trafficking are not taking place in any part of their business.

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To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, this Policy is within the Employee Handbook and all Directors have been briefed on the subject. Deans Civil Engineering will seek to work in partnership with all suppliers to tackle and combat the threat of human trafficking and modern slavery across the construction industry and throughout our supply chain, in accordance with environmental, social and ethical standards.

Policies

Deans Civil Engineering operate the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy – we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. This Policy provides an option for anonymity.
- Code of Conduct – our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour at all times.

Due Diligence

Deans Civil Engineering have been identifying the risk that modern slavery poses to our business, and reviewing industry publications, these include:

- CIOB's report "Building a Fairer System: Tackling Modern Slavery in Construction Supply Chains".
- CIOB's report "Modern Slavery: The Dark Side of Construction".

Our due diligence processes are aimed to:

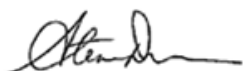
- Identify risk areas in our business and supply chain.
- Reduce the risk of modern slavery from occurring.
- Monitor potential risk areas in our business and supply chain.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. We procure the majority of our sourced goods, services, products, and materials from UK-based organisations. Where possible we will procure from suppliers that are required to comply with UK laws on modern slavery. We want all our suppliers to consider the risks of modern slavery in their supply chain.

Training

All Deans Civil Engineering employees have access to e-learning courses so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. This can also be offered to our supply chain partners.

Signed:



Steven Deans
Managing Director
July 2024