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Statement of Commitment

Heyrod Construction Limited maintains a **zero-tolerance stance** on modern slavery and human trafficking.

We will continue to develop and strengthen our processes to ensure that all those working for and with us are protected, respected, and treated with fairness and dignity.

1. Introduction

This policy is made pursuant to **section 54(1) of the Modern Slavery Act 2015** and constitutes Heyrod Construction Limited's statement on slavery and human trafficking.

The purpose of this policy is to set out our ongoing commitment to preventing modern slavery and human trafficking within our business operations and throughout our supply chains.

We recognise that all forms of modern slavery — including forced labour, bonded labour, human trafficking, and child labour — are severe violations of fundamental human rights. We adopt a **zero-tolerance approach** and are committed to acting ethically, with integrity and transparency in all business dealings.

All employees, subcontractors, and supply-chain partners share a responsibility to remain vigilant to modern slavery risks, however small, and to report any concerns confidentially. Management will act promptly on all reports in line with our whistleblowing procedures.

2. Organisational Structure

Heyrod Construction Limited is a **UK-based principal and specialist contractor**, operating from its Head Office in **Oldham**.

We deliver a wide range of **building and civil engineering projects**, specialising in **reinforced concrete structures**, including conventional concrete frames, slabs, and complex bespoke construction works across the United Kingdom.

Our operations are carried out entirely within the UK, but our supply chains may include materials, products, and labour sourced from international suppliers.

3. Our Supply Chains

Our supply chain includes:

- subcontracted construction and site services;
- the sourcing of construction materials, plant, and manufactured products; and
- the procurement of professional, technical, and support services.

We are committed to ensuring that **modern slavery and human trafficking play no part** in any part of our business or supply chain.

We maintain **direct relationships** with approved suppliers and subcontractors, all of whom are required to adhere to our contractual terms, which include explicit clauses prohibiting forced labour and modern slavery.

Heyrod communicates these expectations through:

- our **supplier and subcontractor terms and conditions**;
- direct engagement by our procurement and commercial teams;
- our **website** and supplier documentation; and
- ongoing **supplier pre-qualification and compliance questionnaires**.

Suppliers are expected to share our commitment and to apply equivalent standards within their own supply chains.

4. Employment Practices

We ensure that all employment within Heyrod Construction Limited is voluntary and fair:

- **Right-to-work checks** are carried out for all employees prior to engagement.
- All employees receive a **written contract of employment** and are paid, as a minimum, in accordance with **UK legislation** or relevant collective agreements.
- All workers are aged **16 years or above**, and young persons are protected from hazardous work.
- Our **recruitment procedures** prohibit fees or deductions for work opportunities.

We expect all **labour agencies and temporary labour providers** to meet the same standards.

They must demonstrate that workers:

- have not paid recruitment fees;
- are legally entitled to work in the UK; and
- are engaged under transparent pay and conditions in line with PAYE requirements.

We review agency providers on our **preferred supplier list** for compliance and will continue to reinforce contractual clauses to strengthen these obligations.

5. Due Diligence and Risk Management

We apply due diligence processes when taking on new suppliers and reviewing existing ones.

Our due diligence includes:

- evaluating suppliers' modern slavery and labour-practice risks;
- reviewing their policies, certifications, and self-assessment questionnaires;
- maintaining long-term relationships with trusted suppliers; and
- reserving the right to **terminate relationships** with any supplier or subcontractor that fails to meet our standards or implement agreed corrective actions.

We continually monitor high-risk categories such as **labour-only subcontractors, imported construction materials, and logistics or warehousing services**.

We also maintain systems to **encourage confidential reporting and whistleblowing** by employees, subcontractors, and other stakeholders, without fear of retaliation.

6. Training and Awareness

To ensure that all staff understand and can identify the risks of modern slavery:

- **Modern slavery awareness training** is provided to relevant staff, particularly those in Human Resources, Procurement, and Site Management roles.
- Refresher briefings and toolbox talks are carried out annually or when updates are made to legislation or company policy.
- Additional training is made available to senior leaders and those responsible for supply-chain engagement.

We continue to promote awareness through internal communications and by embedding this policy into our induction and procurement processes.

7. Continuous Improvement and Collaboration

Heyrod Construction Limited recognises that eradicating modern slavery requires ongoing vigilance and collaboration.

We will:

- continue to assess and strengthen our management systems;
- work with industry partners, clients, and suppliers to share good practice;
- support initiatives promoting ethical labour standards within construction; and
- report annually on our progress in accordance with the Modern Slavery Act 2015.

8. Reporting Concerns

Any employee or third party who suspects modern slavery or human trafficking within our operations or supply chain should report it immediately using one of the following channels:

- A line manager or senior manager;
- The Human Resources Department; or
- The confidential **Whistleblowing Hotline** (details available on the intranet and staff notice boards).

All reports will be investigated promptly, confidentially, and sensitively.

Approved by: Paul Gillespie

Date: 19th January 2026

Next review date: 19th January 2027

Signed:



Applies to: All employees, subcontractors, agency workers, and supply-chain partners.