

Modern Slavery and Human Trafficking Policy

Introduction

Warden Construction Limited is committed to preventing modern slavery and human trafficking in all areas of our business and supply chain. We recognise that the construction sector carries inherent risks due to the use of temporary labour, subcontracting chains, and complex material sourcing routes. As a responsible contractor, we take these risks seriously and maintain robust systems to identify, prevent, and address any form of exploitation.

Although we are not legally required to publish a statement under Section 54 of the Modern Slavery Act 2015, we voluntarily comply with Section 54 and publish an annual Modern Slavery Statement as a matter of good practice, transparency, and ethical responsibility.

This policy sets out the standards and procedures that guide our approach and applies to all employees, subcontractors, suppliers, and partners. It is intended for both internal use and external publication.

Our Commitment

We adopt a zero tolerance approach to modern slavery and human trafficking. Our commitment extends beyond legal compliance; it reflects our values, our responsibilities to the communities we serve, and the expectations of our clients and industry partners. We align our practices with the Modern Slavery Act 2015, Construction Leadership Council (CLC) guidance, GLAA construction risk alerts, CDM 2015 welfare requirements, and the standards required bySSIP and Constructionline accreditation schemes. We expect the same high standards from everyone who works with or for us.

Scope of the Policy

This policy applies to all individuals working for Warden Construction Limited at any level, including employees, agency workers, subcontractors, labour only subcontractors, consultants, suppliers, and any organisation acting on our behalf. Compliance with this policy is a condition of engagement.

Communicating this Policy

Warden Construction Limited ensures that this Modern Slavery and Human Trafficking Policy is communicated clearly and effectively across our organisation and supply chain. The policy is made available to all employees through our intranet, induction materials, and internal communications. Managers and supervisors reinforce key requirements during site briefings, toolbox talks, and project start up meetings to ensure that workers understand their responsibilities and know how to raise concerns.

For subcontractors, labour providers, and suppliers, the policy is shared as part of our pre qualification, onboarding, and contract documentation. We expect all supply chain partners to familiarise themselves with the policy and ensure that its principles are applied within their own operations. Where required, we provide clarification or additional guidance to support compliance.

The policy is also published externally on our website to demonstrate transparency and to support clients, auditors, and stakeholders in understanding our approach. By communicating the policy openly and consistently, we help ensure that modern slavery risks are recognised, reported, and addressed promptly throughout our business and supply chain.

Governance and Responsibilities

Senior Management holds overall accountability for ensuring that modern slavery risks are effectively managed. They approve the annual Modern Slavery Statement, review audit findings, and ensure that corrective actions are implemented. Managers and supervisors are responsible for monitoring working conditions, verifying Right to Work documentation, overseeing labour on site, and escalating concerns. All employees must complete mandatory training, remain alert to signs of exploitation, and report concerns immediately. Suppliers and subcontractors must maintain transparent labour practices, comply with UK employment law, and ensure that their own supply chains are free from exploitation.

Definitions

Modern slavery

Modern slavery refers to situations where individuals are controlled, coerced, or forced to work through threats, violence, deception, debt, or other forms of pressure. It includes circumstances in which a person cannot freely leave or refuse the work.

Human trafficking

Human trafficking involves the recruitment, movement, transfer, or harbouring of individuals for the purpose of exploitation. Exploitation may include forced labour, sexual exploitation, criminal exploitation, or any situation where a person is controlled through coercion, threats, the withholding of identification documents, or the abuse of vulnerability.

Forced labour

Forced labour occurs when individuals are made to work under threat or penalty, or when they have not offered themselves voluntarily. This may involve intimidation, restriction of movement, or manipulation that prevents a person from leaving their work.

Servitude

Servitude refers to a situation where a person is significantly controlled or restricted in their freedom and is required to live and work under conditions they cannot change. This includes situations where a person's autonomy is severely limited.

Debt bondage

Debt bondage occurs when a person is forced to work to repay a debt and is unable to leave because the terms of repayment are unclear, unfair, or manipulated. The debt may increase over time, making it impossible for the individual to regain their freedom.

Exploitation

Exploitation includes any situation where a person is taken advantage of for another's benefit. This may involve coercion, threats, deception, withholding of documents, or abusing a person's vulnerability, such as financial hardship, immigration status, or lack of support.

Understanding the Risks

The construction sector carries several recognised modern slavery risks, and Warden Construction Limited takes a proactive approach to identifying and mitigating them. Temporary labour and agency workers can be vulnerable to coercion, illegal deductions, or exploitative recruitment practices, so we only engage verified labour providers who demonstrate full compliance with UK employment law and ethical sourcing standards. We also monitor CIS arrangements closely, as false self employment can be used to disguise employment relationships or reduce worker protections.

Where materials or labour originate overseas, we conduct enhanced due diligence to understand the supply chain and identify potential risks. Accommodation and transport provided by labour suppliers can create dependency or control, and we therefore review these arrangements to ensure they are safe, fair, and voluntary.

Subcontracting chains can obscure accountability, so we require full transparency from all subcontractors and written approval before any work is sub subcontracted. We also monitor for unauthorised labour substitution through site access controls, supervision, and regular verification of worker identity and Right to Work documentation.

Isolated or unsupervised working conditions can increase vulnerability, so our site teams conduct welfare checks, maintain strong supervisory presence, and carry out private worker interviews where concerns arise.

Our approach is informed by guidance from the Construction Leadership Council (CLC), GLAA construction sector risk alerts, and the welfare requirements set out in CDM 2015. These frameworks help ensure that our risk management processes remain robust, proportionate, and aligned with industry best practice.

Due Diligence and Supply Chain Controls

We undertake thorough due diligence before engaging any labour provider, subcontractor, or supplier. Labour agencies must demonstrate compliance with Constructionline or equivalent SSIP schemes, confirm that no recruitment fees are charged to workers, and provide transparent information about labour sourcing routes.

Subcontractors must complete our Pre Qualification Questionnaire, provide evidence of their own modern slavery controls, and obtain written approval before sub subcontracting any work. Suppliers must provide information on ethical sourcing and cooperate with enhanced checks where risks are identified. We reserve the right to suspend or terminate relationships where compliance cannot be demonstrated.

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Site Level Safeguards

We maintain strong site level controls to protect workers. All sites operate access control systems to prevent unauthorised labour substitution. Managers conduct regular welfare checks, monitor working hours, and ensure that welfare facilities meet CDM 2015 standards. Where concerns arise, private worker interviews are carried out to understand the situation and identify any signs of exploitation. We also verify Right to Work documentation and conduct spot checks to ensure ongoing compliance.

Training and Awareness

All employees receive Modern Slavery Awareness Training as part of their induction. This training explains the nature of modern slavery, how to recognise warning signs, and how to report concerns. Annual refresher training is mandatory. Training materials are reviewed regularly to ensure they remain relevant and aligned with industry guidance.

Reporting Concerns

We encourage openness and will support anyone who raises concerns in good faith. Concerns may be reported to HR, a line manager, a site manager, or Senior Management. Reports are treated confidentially and investigated promptly. Employees may also contact the Government's 24 hour Modern Slavery Helpline (0800 121 700). Retaliation against anyone who raises a concern is strictly prohibited.

Investigations and Corrective Action

When concerns are raised, we will conduct a confidential investigation, interview relevant individuals, and review documentation. Where necessary, we will suspend suppliers or subcontractors while investigations take place.

If criminal activity is suspected, we will report it to the appropriate authorities. Corrective actions will be implemented promptly, and follow up audits will be carried out to ensure improvements are sustained.

Supplier Compliance and Accreditation

Warden Construction Limited encourages all subcontractors within our supply chain to hold Constructionline andSSIP accreditation, as these schemes provide robust, independently verified checks on health and safety management, insurance, ethical labour practices, and compliance with the Modern Slavery Act 2015.

We recognise, however, that accreditation may not always be held or may not be appropriate for certain specialist trades or smaller suppliers. In these cases, we assess compliance through our own pre qualification and supplier questionnaires, which require evidence of:

- appropriate insurance
- compliance with UK employment and labour legislation
- modern slavery and human trafficking controls
- ethical working practices and reporting mechanisms
- health and safety competence and governance

Subcontractors who can demonstrate compliance through accreditation or through our internal assessment process may be considered for inclusion on our approved supplier list.

Continuous Improvement

Warden Construction Limited is committed to continually strengthening our approach to preventing modern slavery and human trafficking. We review this policy annually and update our processes to reflect changes in legislation, industry guidance, and emerging risks. Our continuous improvement activities for the coming year include:

Strengthening Awareness and Reporting

We will continue to build awareness across our workforce and supply chain by enhancing induction content,

reinforcing reporting mechanisms on our intranet and site noticeboards, and ensuring that all workers understand how to raise concerns confidentially.

Enhanced Supplier and Subcontractor Risk Assessment

We will increase the depth and frequency of supplier checks by expanding the number of suppliers assessed through our pre qualification questionnaires, reviewing Constructionline/SSIP accreditation status annually, and applying enhanced due diligence to higher risk trades, labour providers, and overseas suppliers.

Improved Training and Competency

We will strengthen training across the organisation by revising our induction programme to include mandatory Modern Slavery Awareness Training within the first week of employment, providing refresher training for managers and supervisors, and updating training materials to reflect Construction Leadership Council guidance and GLAA alerts.

Enhanced Site Controls and Audit Processes

We will continue to improve our monitoring and reporting through increased site welfare audits, unannounced spot checks, private worker interviews, and access control checks.

All audit reports will be reviewed by HR in coordination with the Health & Safety team. A consolidated RAG rated report will be produced quarterly and escalated to the Senior Leadership Team to provide oversight of emerging risks and recurring issues.

Policy and Governance Development

We will ensure our governance framework remains robust by reviewing all modern slavery related policies annually, updating procedures to reflect legislative changes and industry best practice, and ensuring subcontractor agreements and tender documents include clear anti slavery requirements.

Collaboration and Industry Alignment

We will continue to align with recognised industry bodies and guidance, including the Construction Leadership Council, the Gangmasters & Labour Abuse Authority, SSIP member schemes, and public sector procurement frameworks. Insights from site audits, supplier reviews, worker interviews, and incident reporting will be used to inform improvements and strengthen our controls.

Our aim is to ensure that our systems remain effective, proportionate, and responsive to evolving risks across our operations and supply chain.

Policy Review

This policy is owned by Senior Management and reviewed annually or sooner if legislation or industry standards change. All employees, subcontractors, and suppliers are expected to familiarise themselves with this policy and comply with its requirements.

Signed
Ian Williams
Managing Director



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