

Anti-Slavery Policy

Policy statement

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

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This Policy takes into account and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015 and ISO 14001:2015. The implementation and operation of this management system underlines our commitment to this policy statement. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities

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

Who we are

The Company is a specialist sub-contractor within the UK construction industry undertaking Subcontract works consisting of Diamond Drilling, Sawing, etc. (which is the forming of precision holes, cuts, openings & recesses in concrete, brickwork, etc.), Controlled Demolition (using remote controlled Robotic Breakers, Bursters & Crunchers, etc.), Passive Fire Protection (which involves the sealing of gaps in a building with mastic, etc., and the application of fire-retardant coatings such as intumescent paint), Builderswork (which includes the safe removal of Lifts/Lift Shafts, etc.) & Strip Out (being the removal of suspended ceilings, internal walls, etc. without affecting the integrity

of the building structure). We have a multi-disciplined supply chain (including expert consultants & specialists) to support us through the different aspects of/provisions of these services

The Company employs over 150 employees. Moreover, the Company engages up to 100 agency workers and subcontracts to support the business. Every single employee, and agency worker must have their right to work documentation and CSCS cards verified by a member of the HR team prior to commencing any work on one of our sites.

Responsibility for the policy

The Board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The HR Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the HR Manager.

Compliance with the policy

You must ensure that you read, understand, and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify HR Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify HR Manager or report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

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 the 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. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

All of our people are required to comply with this policy, if one of our people fails to do so, they will be subject to disciplinary action under our Disciplinary Procedure.

Communication and awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Risk Assessment

The risk of modern slavery begins with the hiring: does the contractor comply with legal and social standards in the employment of its staff..? Beyond that, and depending on the size of the project, ensuring the appropriate policies and practices in place to prevent third-party contractors, such as labour providers, from using people in modern slavery conditions.

We recognise that we have a responsibility to take a robust approach to slavery and human trafficking. Modern Slavery is complex and hidden, so our risk assessment includes regular contact with our supply chain ensuring supplier engagement.

Prior to taking on a new member of staff we ensure that we complete the necessary pre-employment checks to verify the workers' identity and eligibility to work in the UK. We insist on inspecting the originals of the document(s) which are required by statute and this in itself provides a measure of additional security because those exploiting vulnerable people commonly withhold passports, etc. in order to prevent 'escape'. We would never employ/engage those who are unable to provide us with such evidence in person. The recruitment agencies we use are required to make the same checks before and send evidence of those checks prior to supplying a worker to us; so in this case

there is a double check. All our employees are paid by bank transfer, and we never make payments into third party bank accounts; thereby minimising the risk of forced or compulsory labour.

If we became aware of any potential issue with our staff, agency workers or sub-contractors we would investigate and if our concerns were founded immediately report to the police on 101. If a person was in danger, we would immediately ring 999. We operate under ISO 9001, ISO 14001 and ISO 45001.

Whilst we understand that that Construction sector is considered high risk for modern slavery, LDD are committed to using reputable suppliers ensuring a verification process to the supply chain is in place to ensure ethical standards are achieved at all times.

Training

The Company provides all employees with anti-modern slavery training which is renewed annually and forms part of LDD Standards training when someone joins the company. Our online Modern Slavery Training Course is for everyone provides crucial information on how to report, acknowledge and handle modern slavery in and around the workplace. Alongside this, it touches upon the Modern Slavery Act 2015 and is CPD Accredited. The training is available in 36 different languages.

KPIs

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of Audits by Directors, Managers, and Safety Managers
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of and compliance with our expectations.

Due Diligence

The Company will achieve these aims by our initiative to identify and mitigate risk in the following ways (But not limited to):

- More stringent vetting and investigation of our supply chain (contractors, sub- contractors, policies, contracts etc.).
- Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work
- We encourage the reporting of concerns and the protection of whistle blowers (see Whistleblowing Policy)
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

- To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.

Signed on behalf of LDD Construction Ltd



Marc Seagroatt

Director

12th January 2026

Review Date: 11th January 2027