
Modern Day Slavery Policy

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1.0 Policy Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to minimise the risk of modern slavery in our business and supply chains.

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. 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.

2.0 Our Business and Supply Chains

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

3.0 Supplier Due Diligence

We conduct due diligence on all new suppliers during onboarding and on existing suppliers at regular intervals.

This includes:

- Assessing risks in the provision of services
- Auditing suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
 - Their employees work voluntarily and are entitled to leave work
 - They provide each employee with a contract that contains a reasonable notice period
 - They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
 - They don't require employees to surrender their passports or work permits as a condition of employment
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4.0 Responsibility for the Policy

The Company Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Directors have 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. Line managers 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 a director.

5.0 Compliance with the Policy

All staff including employees, contractors, agency staff and temporary workers are made aware of this policy. They must make a declaration that they have read, understand and comply with this policy as part of their employment.

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. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. Staff must notify a director of the Company as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. Staff 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 staff believe or suspect a breach of this policy has occurred or that it may occur, they must notify a director of the Company or report it in accordance with our Whistleblowing Policy as soon as possible. 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 a director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

6.0 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.