

SMITH BROTHERS BUILDERS LTD: MODERN SLAVERY POLICY

1. Policy Commitment

1.1 **Smith Brothers Builders Ltd** (“Smiths”) maintains a zero-tolerance stance toward all forms of modern slavery, including servitude, forced labour, and human trafficking. We are committed to conducting our business with absolute integrity and implementing rigorous controls to ensure that no such exploitation exists within our own operations or any of our supply chains.

1.2 We uphold the highest ethical standards and expect the same from our contractors, suppliers, and business partners. Our contracting processes include specific prohibitions against the use of forced or trafficked labour, and we require our primary suppliers to hold their own sub-suppliers to these same high standards.

1.3 This policy is mandatory for everyone working for or on behalf of **Smiths**, including all employees, directors, agency workers, subcontractors, and external consultants.

2. Governance and Responsibility

2.1 The Directors hold final responsibility for ensuring this policy meets our legal and ethical duties.

2.2 The leadership team is responsible for the daily implementation of this policy, including the auditing of internal systems to ensure they remain effective in detecting and preventing modern slavery.

2.3 Managers at every level must ensure that their team members understand this policy and receive regular, relevant training on the risks of modern slavery in construction supply chains.

3. Adherence and Reporting

3.1 Every individual working under the **Smiths** banner has a collective responsibility to prevent, detect, and report any signs of modern slavery.

3.2 If you suspect a breach of this policy—either within our company or a supplier’s business—you must notify your **Site Supervisor or a Director** immediately. Alternatively, you may report your concerns in accordance with our **Whistleblowing Policy**.

3.3 We encourage a culture of transparency. No employee will face any form of retaliation or detrimental treatment for reporting a genuine suspicion in good faith, even if that suspicion later proves to be unfounded.

4. Awareness and Training

4.1 Understanding modern slavery risks is a mandatory part of the induction process for every new starter at **Smiths**.

4.2 Our zero-tolerance approach must be clearly communicated to all external partners at the very beginning of our business relationship and reinforced throughout.

5. Enforcement

5.1 Any employee found to have breached this policy will face disciplinary proceedings, which may result in dismissal for gross misconduct.

5.2 **Smith Brothers Builders Ltd** reserves the right to terminate relationships with any third-party organisation or individual that fails to comply with these standards.

John Smith — Director

Colin Smith — Director

Address: 12 Strand, Beith, KA15 1DT

Company Tel: 01505 502144