

Modern Slavery & Human Trafficking Policy & Statement

Introduction

Guildmore Group is committed to preventing modern slavery, forced labour, servitude and human trafficking in all areas of its business and supply chains.

We recognise our responsibilities under the Modern Slavery Act 2015 and are committed to conducting business ethically, transparently and with integrity.

Guildmore Group has a zero-tolerance approach to modern slavery and expects the same high standards from all employees, agency workers, contractors, subcontractors, consultants, suppliers and business partners.

This policy applies to all employees, workers, agency workers, contractors, subcontractors, consultants, suppliers and anyone acting on behalf of Guildmore Group.

Organisation Structure, Business and Supply Chains

Guildmore Group is a private commercial UK construction and property services group operating across England. We deliver a range of construction, refurbishment, fire safety, cladding remediation, retrofit and decarbonisation, property improvement and land development services to clients across the public and private sectors.

To support our operations, we work with a wide range of suppliers, subcontractors, labour providers, manufacturers, professional consultants and other business partners. We recognise that modern slavery risks can arise within the construction sector, particularly where supply chains are complex or labour-intensive. Guildmore Group is committed to identifying, assessing and mitigating these risks through responsible procurement, appropriate due diligence and ethical business practices.

Our Commitment

Guildmore Group is committed to:

- Comply with statutory obligations to publish this Policy as a commercial organisation that has a turnover of over £36m
- Complying with the Modern Slavery Act 2015 and relevant legislation that predicates Modern Slavery compliance (Procurement Act 2023)
- Conducting business fairly, ethically and with integrity.
- Preventing modern slavery and human trafficking throughout our operations and supply chains.
- Promoting transparency in all business relationships.
- Seeking to work with suppliers and contractors who share our commitment to ethical working practices and compliance with the Modern Slavery Act 2015.
- Taking appropriate action where concerns are identified.

Modern slavery includes, but is not limited to:

- Slavery
- Servitude

- Forced or compulsory labour
- Human trafficking
- Debt bondage
- Child labour where prohibited by law

Roles and Responsibilities

Board of Directors

The Board has overall responsibility for ensuring that this policy is implemented and reviewed annually.

Managers

Managers are responsible for:

- Remaining vigilant to the signs of modern slavery.
- Promoting ethical working practices.
- Ensuring concerns are reported promptly.
- Supporting investigations where necessary.
- Utilising the Guildmore software tool (C LINK) to monitor sub-contractor compliance (documentation and appropriate controls).

Procurement and Commercial Teams

Employees responsible for engaging suppliers and subcontractors must:

- Carry out appropriate due diligence.
- Embedding appropriate clauses for compliance within formal contracts.
- Consider modern slavery risks before appointing suppliers.
- Monitor supplier performance where appropriate.
- Escalate concerns where standards are not met.

Employees

All employees are responsible for:

- Complying with this policy.
- Completing mandatory training.
- Reporting concerns immediately.
- Cooperating with any investigations.

Recruitment and Employment Practices

Guildmore Group is committed to fair and lawful recruitment practices.

We seek to minimise the risk of modern slavery by:

- Carrying out Right to Work checks before employment commences.
- Verifying workers' identities and eligibility to work in the UK.
- Ensuring all employment is entered into freely and voluntarily.
- Paying employees in accordance with applicable employment legislation.
- Using reputable recruitment agencies and labour providers that are expected to comply with UK employment law and the Modern Slavery Act 2015.
- Complying with all relevant employment legislation and ethical recruitment practices.

Due Diligence

Guildmore Group undertakes appropriate due diligence when selecting suppliers, subcontractors and labour providers to help minimise the risk of modern slavery within our operations and supply chains.

Our due diligence activities include:

- Building long-term relationships with suppliers who demonstrate a commitment to ethical business practices.
- Assessing suppliers before engagement.
- Considering modern slavery risks as part of our procurement and supplier selection.
- Communicating our expectations regarding ethical business practices.
- Auditing supplier performance to ensure practices are conformed to..

Guildmore Group expects its suppliers, subcontractors and labour providers to comply with all applicable legislation relating to modern slavery and human trafficking and to maintain appropriate policies and procedures to prevent such practices within their own operations and supply chains.

Where concerns are identified, we will work with suppliers to improve standards. Where appropriate, Guildmore Group reserves the right to suspend or terminate business relationships where suppliers fail to meet acceptable standards.

Risk Assessment

The construction industry presents recognised risks relating to modern slavery due to:

- Agency labour.
- Temporary workers.
- Extensive subcontracting.
- Labour-intensive activities.
- Complex supply chains.
- Global supply chains for certain products and materials.

Guildmore Group seeks to manage these risks through:

- Appropriate recruitment practices.
- Supplier due diligence.
- Management oversight.
- Site supervision.
- Employee awareness.
- Internal reporting procedures.

We regularly review these risks to ensure our controls remain effective.

Recognising Modern Slavery

Potential indicators of modern slavery may include:

- Workers appearing fearful or withdrawn.
- Restricted freedom of movement.
- Workers not possessing their own identification documents.
- Evidence of debt bondage.
- Poor living or working conditions.
- Physical signs of abuse.

- Individuals appearing to be controlled by another person.
- Reluctance to speak independently.

The presence of one or more indicators does not necessarily mean modern slavery is taking place, but any concerns should be reported.

Reporting Concerns and Escalation

Everyone working for or on behalf of Guildmore Group has a responsibility to report suspected modern slavery.

Concerns should be reported immediately to:

- Your Line Manager
- Human Resources
- A Director

Concerns may also be raised under the Company's Whistleblowing Policy.

All reports will be treated seriously and investigated appropriately.

No employee who raises a genuine concern in good faith will suffer any detriment for doing so.

Information will be provided to the Guildmore live construction sites notices:

- Confidential reporting: Anonymous report to the UK Modern Slavery & Exploitation Helpline (0800 0121 700)
- If a worker is in immediate physical danger to contact the emergency services (999)

Training

Guildmore Group requires all employees to complete Modern Slavery Awareness training through the Company's online learning platform.

The training enables employees to:

- Understand what modern slavery is.
- Recognise the warning signs.
- Understand their responsibilities.
- Know how to report concerns.

Additional training may be provided for managers and employees working in higher-risk areas, including procurement and recruitment.

Measuring Effectiveness

Guildmore Group monitors the effectiveness of this policy through a range of measures, including:

- Completion rates for Modern Slavery Awareness training.
- Completion of Right to Work checks.
- Supplier due diligence activities.
- Monitoring and investigating reported concerns.
- Periodic review of supplier relationships.

- Annual review of this policy and statement (next review JUNE 2027)

At the date of approval of this policy, Guildmore Group is not aware of any substantiated incidents of modern slavery within its own operations.

Review

This policy and statement will be reviewed annually, or sooner where there are changes to legislation or the nature of our business.

Guildmore Group remains committed to continually improving its practices to combat modern slavery and human trafficking.

Approval

This Policy & Statement has been approved by the Chief Operating Officer on behalf of Guildmore Group and will be reviewed annually.

Signed by Chief Operating Officer:



John Walsh