

CLAYWOOD CONSTRUCTION LTD

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MODERN SLAVERY POLICY

Company Policy Document

Policy Reference	CWP29
Version Date	29 May 2026
Review Date	20 March 2027
Approved By	Paul Burke — Managing Director
Applies To	All employees, directors, contractors, agency workers, volunteers, agents and business partners
Legislative Basis	Modern Slavery Act 2015

1. Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, forced and compulsory labour, and human trafficking — all of which involve the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Claywood Construction Ltd has a zero-tolerance approach to modern slavery and human trafficking in all its forms. We are committed to acting ethically and with integrity across all our business dealings and supply chains.

We are committed 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 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 our contractors, suppliers and other business partners. 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 our suppliers to hold their own suppliers to the same high standards.

2. Due Diligence

Our initiatives to identify and mitigate the risk of modern slavery in our business include;

- Transparency in our recruitment process which is regularly reviewed. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new employees and ensure that we can confirm their identities and that they are paid directly into an appropriate personal bank account.
- Claywood requires its supply chain to complete a robust pre-qualification questionnaire approval process that requires them to take steps to eliminate slavery in their own business and supply chain and are committed to providing modern slavery training for our site management to highlight the issues around modern slavery.
- We encourage anyone (including employees, sub-contractors, suppliers, and clients) to report in good faith (confidentially if they so wish) any issues or concerns about potential ethics, human rights, legal or regulatory violations including improper or unethical business practices such as fraud or bribery.
- We will monitor these processes on a regular basis adapting where necessary to any changing needs.

2. Risks and Monitoring

The main risks of incident within our business are potentially with our sub-contractors and suppliers of labour with risk from overseas supplies of materials.

Assessments are conducted incorporating Right to Work checks with direct employees, supply chain pre-qualification information, on our sites thorough inductions are actioned with the addition of card checks on labour and sub-contractors. On occasion where there may be temporary site labour requirements Claywood will use the services of fully compliant labour agencies. We also operate a preferred supply chain system ensuring Modern Slavery Act 2015 is predominant on their agenda.

3. Key Performance Indicators and Reporting

Following a review of the effectiveness of the steps we take to ensure that the Modern Slavery Act 2015 is adhered to within our business and supply chain, we consider that there is no such current activity and we will continue our efforts in respect of this.

For employees Claywood have a Whistleblowing Policy EH8 part of the Staff Handbook which advises a reporting channel, our sites will display the government helpline poster.

4. Responsibility for the Policy

The Managing Director 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 Managing Director holds 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 receive adequate and regular training on it and the issue of modern slavery in supply chains.

All employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Managing Director.

4. Compliance with the Policy

All individuals within the scope of this policy must ensure that they read, understand and comply with it.

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 your Line Manager or the Managing Director 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 part of our business or supply chains at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or may occur, you must report it to your Line Manager or the Managing Director — or in accordance with our Whistleblowing Policy EH8 — as soon as possible. Where appropriate, and with the welfare and safety of local workers as a priority, we will provide support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices.

If you are unsure whether a particular act, the treatment of workers, or working conditions within any tier of our supply chains constitutes a form of modern slavery, please raise it with your Line Manager or the Managing Director.

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. No one will suffer any detrimental treatment because of reporting a concern in good faith.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe you have suffered any such treatment, you should inform the Managing Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

5. Communication & Awareness

Training on this policy and on Modern Slavery, 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. Regular refresher training will be provided as necessary.

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

6. 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.

7. Policy Authorisation

This policy has been reviewed, approved, and authorised by the Managing Director of Claywood Construction Ltd. It is effective from the date of signing below and will be reviewed annually or sooner in the event of legislative or organisational change.

Signed	
Name	Paul Burke
Position	Managing Director
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