



# Modern Slavery Policy Statement

BS(D).11.08

June 26

## Policy Statement

Bridgestone Construction are committed to conducting all business activities ethically, with integrity and transparency. We have a zero-tolerance approach to all forms of modern slavery, including slavery, servitude, forced or compulsory labour, child labour, debt bondage and human trafficking.

We are committed to ensuring that modern slavery does not occur within our own business or anywhere within our supply chains.

This policy supports our obligations under the Modern Slavery Act 2015 and reflects our commitment to protecting human rights and promoting ethical business practices throughout our operations.

## Scope

This policy applies to all employees, directors, temporary and agency workers, labour-only subcontractors, consultants, suppliers, service providers, subcontractors and any other person working on behalf of the company.

Compliance with this policy is a condition of working with or for the company.

## Our Commitment

We are committed to:

- Operating responsibly and ethically.
- Complying with all applicable legislation.
- Respecting internationally recognised human rights.
- Preventing modern slavery within our business and supply chain.
- Maintaining effective systems to identify and manage risks.
- Taking immediate action where concerns are identified.

We will never knowingly engage with organisations involved in modern slavery or human trafficking.

## Risk Assessment

As a construction principal contractor, we recognise that the industry presents increased risks associated with:

- Agency labour
- Labour-only subcontractors
- Manufacturing and imported construction products

We undertake proportionate risk assessments to identify areas where the likelihood of modern slavery may be higher. Risk assessments are reviewed regularly and whenever significant changes occur.

## Due Diligence

We operate due diligence procedures designed to reduce the risk of modern slavery. These include:

- Supplier pre-qualification assessments
- Verification of company credentials
- Right to Work verification for employees
- Contractual requirements for suppliers to comply with the Modern Slavery Act
- Periodic supplier reviews
- Investigation of concerns raised through audits or whistleblowing.

Where appropriate, suppliers may be required to provide evidence of their own Modern Slavery Policy or annual Modern Slavery Statement.

## Supply Chain Expectations

We expect all suppliers and subcontractors to:

- Operate legally and ethically.
- Prohibit all forms of modern slavery.
- Pay workers lawfully.
- Ensure workers are employed voluntarily.
- Verify the identity and right to work of employees.



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- Prevent the charging of recruitment fees.
- Provide safe working conditions.
- Permit workers to leave employment following appropriate notice.
- Report suspected incidents of modern slavery.

Failure to meet these expectations may result in termination of contracts.

## Recruitment

We operate robust recruitment procedures to ensure:

- Workers are employed voluntarily.
- Identity checks are completed.
- Right to Work documentation is verified.
- Employment agencies are reputable.
- Recruitment practices comply with UK legislation.
- No employee is required to pay recruitment fees.
- All workers receive lawful wages and employment conditions.

## Responsibilities

### Managing Director

The Managing Director has overall responsibility for:

- Approval of this policy.
- Promoting ethical business practices.
- Ensuring appropriate resources are available.
- Reviewing policy effectiveness.

### Senior Management

Senior managers are responsible for:

- Implementing this policy.
- Identifying risks.
- Monitoring compliance.
- Ensuring concerns are investigated.
- Promoting awareness throughout the business.

### Procurement Personnel

Those responsible for procurement shall:

- Assess supplier risk.
- Carry out appropriate due diligence.
- Maintain approved supplier records.
- Escalate concerns where necessary.

### Site Managers

Site Managers are responsible for:

- Monitoring labour providers.
- Identifying signs of exploitation.
- Ensuring workers have appropriate welfare facilities.
- Reporting concerns immediately.

### Employees

Every employee has a responsibility to:

- Read and comply with this policy.
- Remain vigilant.
- Report any concerns immediately.
- Cooperate with investigations.
- No employee will suffer detriment for raising concerns in good faith.



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### Reporting Concerns

Any employee, subcontractor or supplier who suspects modern slavery should report concerns immediately to:

- Their Line Manager
- Senior Management
- The Managing Director

Reports will be treated confidentially wherever possible. Concerns will be investigated promptly and fairly.

Where criminal activity is suspected, the company will cooperate fully with the relevant enforcement authorities.

### Training

Appropriate training will be provided to employees whose work involves procurement, recruitment, contract management or site supervision. Training will include:

- Identifying indicators of modern slavery
- Reporting procedures
- Supply chain responsibilities
- Company expectations

Modern slavery awareness forms part of employee induction.

### Monitoring and Review

We monitor the effectiveness of this policy through:

- Supplier reviews
- Internal audits
- Procurement monitoring
- Staff training records
- Investigation outcomes
- Management review meetings

The policy will be reviewed annually or sooner if legislation, guidance or business activities change.

### Breaches

Any employee found to have breached this policy may be subject to disciplinary action, which may include dismissal.

Suppliers or subcontractors found to be involved in modern slavery may have their contracts suspended or terminated and may be removed from the Approved Supplier List.

This policy has been approved by the Managing Director and applies to all company operations.

**Signed:** Mark Lyons, MD

**Date:** 18/6/26