

Modern Slavery Statement

Change Record

Date	Revision	Change Reference
January 2022	1.0	Contained in Policies and Procedures Document
February 2025	2.0	New format policy
April 2026	3.0	New company logos

Purpose

The Company is committed to the practice of responsible corporate behaviour and to complying with all laws, regulations and other requirements which govern the conduct of our operations.

The statement sets down the Company's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains.

We all have a duty to be alert to risks, however small. Team members are expected to report their concerns and management to act upon them.

Aims of Policy

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

Scope of Policy

This policy applies to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties (including individuals, partnerships and bodies corporate) associated with the Company or any of its subsidiaries.

Leadership

The Senior Management Team endorses this policy statement and is fully committed to its implementation.

Organisational Structure and Supply Chains

This statement covers the business activities of the Company which are as follows:

Pole restoration services, the design manufacture, supply and repair of high quality specialist equipment and services to the electrical supply, rail, arboriculture and telecoms industries. CNC machining and welding capability, the Inspection and testing of earthing equipment, lifting equipment and fall arrest equipment. The provision of training in the safe use of PPE, safety, rescue and earthing equipment.

Due Diligence and Risks

The Company operates in the United Kingdom.

Supply

Suppliers demonstrate that they adhere to our approved supplier process which also includes their sustainability policies.

The Company would not work with suppliers that do not adhere to the ETI.

The Company performs regular audits of our suppliers, exporters and importers

Due Diligence Processes for Slavery and Human Trafficking

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

The Company's due diligence process includes:

- Completion of the supplier questionnaire which includes questions regarding the Modern Slavery
- Building long-standing relationships with suppliers
- Making clear our expectations of business partners
- Evaluating the modern slavery and human trafficking risks of each new supplier

Responsibility for the Company's Anti-Slavery Initiatives is as follows:

- Policies: The Human Resources Department is responsible for creating and reviewing policies. The process by which policies are developed is looking at best practice and adapting to the needs of the business.
- Risk assessments: The QHSE Manager is responsible for risk assessments in respect of human rights and modern slavery by a process of supplier audit.
- Due diligence: The QHSE Manager is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Reporting

Collectively we share the responsibility to give feedback to each other when we fail to live up to our values, or in more serious situation to report inappropriate behaviour.

We will never tolerate harassment of any kind including sexual, racial, verbal or non-verbal as well as physical. If you observe unacceptable behavior, report it.

Reporting can be to any manager, however where possible or appropriate this should be your line manager.



Associated Documents

Supplier Self Audit Questionnaire (Doc Ref 2.0001.XXX)

Training

The company will provide training to all employees to help them understand their duties and responsibilities under this policy.

Contravention of the Policy

Failure to comply with any of the requirements of this policy is a disciplinary offence and may result in disciplinary action being taken under the Company's disciplinary procedure.

Reference Legislation

Modern Slavery Act 2015