ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

This policy applies to everyone employed by UKSE Group or who works on our behalf in any capacity. This includes but is not limited to all employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners. It is essential that this policy is read, understood, and complied with in its entirety.

The UKSE Group Board of directors 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 Modern Slavery Act 2015 covers four key activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed using coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

Modern slavery is the illegal exploitation of people for personal or commercial gain. It takes various forms and can include forced employment, sexual or criminal exploitation or domestic servitude. Through threats, violence or coercion, victims of modern slavery may:

- Suffer unacceptably low pay, or no pay at all;
- Have excessive wage deductions imposed on them in the form of debts that cannot realistically be paid back;
- Be subject to poor working conditions;
- Be subject to humiliation or ill-treatment;
- Be housed in squalid accommodation;
- Have their identity documents taken away from them.

All employees have responsibilities to ensure our contractors are safeguarded, treated fairly and with dignity. UKSE Group will:

- Maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation;
- Always maintain a professional and transparent recruitment procedure;
- Monitor our supply chain annually;
- Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc.;
- Ensure we have in place an open and transparent grievance process for all staff;
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare;
- Always maintain a robust Whistleblowing Policy to ensure confidence in confidential reporting of concerns;

Managers

All managers are responsible for ensuring those reporting to them understand and comply with this policy. Those employees working in areas deemed to be of 'high risk' will be given adequate training on this policy and the issue of modern slavery in supply chains. They will:

- Listen and be approachable to contractors;
- Respond appropriately if they are told something that might indicate a contractor is in an exploitative situation;
- Remain alert to indicators of slavery;
- Raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can recognise the signs of trafficking and exploitation and know what to do;
- Use their experience and professional judgement to gauge situations.

Consultants/Employees

We all have responsibilities under this policy. Whatever role or level of seniority, we must:

- Be vigilant - if it is suspected that someone (a contractor or someone in our supply chain) is being controlled or forced by someone else to work or provide services, report any concerns to a line manager or a main board director.
- Follow our reporting procedure if it is highlighted that someone may be being exploited or ill-treated, this may be in any of the following forms:

  - Workers who do not have written contracts of employment;
  - Workers who have had to pay fees to obtain work;
  - Workers who are not able to prove they are legally entitled to work in the UK;
  - Workers showing signs of physical abuse and/or appear malnourished or unkempt;
  - Workers who seem to have few personal possessions or often wear the same clothes;
  - Workers who appear frightened or reluctant to talk to others;
  - Workers who are dropped off or collected for work by the same person regularly, either early or very late at night
  - A large number of people working who are listed as living at the same address may indicate high shared occupancy – often a factor for those being exploited;
  - Agencies charging suspiciously low rates against standard industry pricing.
- Immediately report if it is believed there is more we can do to prevent people from being exploited.

Remember, a person may display a number of the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. Often it is possible to build up a picture of the person's circumstances which may indicate something is not right.

If there is any form of suspicion, report it.

Supply chains

UKSE Group will monitor its supply chain to ensure the potential for slavery and human trafficking is significantly reduced. We will clearly communicate that we are not prepared to accept any form of exploitation and all our standard supplier contracts will contain an anti-slavery clause. This clause prohibits suppliers and their employees from engaging in slavery or human trafficking.

General recruitment

- We will always ensure all staff have a written contract of employment.
- We always ensure staff are legally able to work in the UK through legislated right to work checks.
- We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, the HR department or recruiting manager will follow our reporting procedures.

Reporting slavery

Talking to someone about any suspicions or concerns may stop someone else from being exploited or abused. If it is believed that someone is in immediate danger, dial 999. Otherwise, you should discuss your concerns with your Group Operations Director who will decide a course of action.

Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with your Group Operations Director before taking any further action.

UKSE Group will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that any form of modern slavery is or may be taking place in any part of our own business or in any of our supply chains.

Training

We will ensure that all staff are briefed on this policy and provide further training to all staff members who are involved in managing the recruitment procedure.

Monitoring our procedures

We will review our Anti-slavery Policy regularly, at least annually. We will provide information and/or training on any changes we make.

Martin Wood



Managing Director **Dec 2025**