GLASGIVEN CONTRACTS LTD

MODERN SLAVERY & HUMAN TRAFFICKING POLICY 2026

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1.0 MODERN SLAVERY & HUMAN TRAFFICKING POLICY

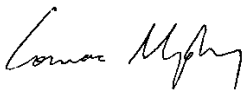
Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial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

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and 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 there is 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 of our contractors, suppliers and other business partners, and 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 that our sub-contractors and suppliers will hold their own suppliers to the same high standards.

Our zero-tolerance approach to modern slavery applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.



Signed: _____

Cormac Murphy
Managing Director

Date: 17/07/2026

Review Date: May 2027

2.0 RESPONSIBILITY FOR THE POLICY

The 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 Managing Director approves this policy on behalf of the Board.

The Finance Manager in collaboration with the Human Resource Business Partner has 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 are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Finance Manager.

3.0 COMMUNICATION, TRAINING & AWARENESS OF THIS POLICY

Training on this policy, 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, and regular refresher training will be provided as necessary to Managers, procurement staff and others with supply-chain responsibilities.

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

Training includes:

- Recognising indicators of modern slavery
- Reporting concerns
- Supplier due diligence
- Ethical procurement

We are committed to ethical business practices, protecting human rights, complying with the Modern Slavery Acy 2015 and promoting transparency throughout our operations and supply chains.

4.0 RISK ASSESSMENT

Annual risk assessments identify areas of elevated risk including:

- Subcontract Labour
- Civil Engineering Contractors
- Specialist Trade Contractors
- Labour Agencies
- Recruitment Agencies
- Temporary Labour
- Material Suppliers
- Plant Hire Companies
- Concrete Manufacturers
- Steel Suppliers

- Timber Suppliers
- PPE Suppliers
- Waste Management Contractors
- Transport & Logistics Providers
- Professional Consultants
- suppliers operating in sectors or regions recognised as higher risk.

We recognise that construction is considered a sector where there can be increased risks associated with temporary labour, subcontracting and complex supply chains

To manage these risks, Glasgiven Contracts Ltd:

- Uses approved suppliers wherever possible
- Undertakes supplier due diligence
- Required contractual compliance with the Modern Slavery Act 2015
- Reviews supplier performance
- Investigates any concerns raised, and
- Reserves the right to terminate contracts where unacceptable risks are identified

5.0 DUE DILIGENCE

Glasgiven Contracts Ltd Procurement Department applies due diligence procedures before engaging suppliers and subcontractors. These include:

- Supplier pre-qualification
- Review of Legal Compliance
- Review of Modern Slavery Statements where applicable
- Assessment of recruitment practices
- Confirmation of ethical employment standards
- Inclusion of contractual modern slavery clauses, and
- Ongoing monitoring based upon risk

High-risk suppliers may be audited or asked for corrective actions.

Purchasing decisions consider ethical performance alongside cost, quality and service. Suppliers are expected to cascade equivalent standards through their own supply chains.

6.0 SUPPLIER MANAGEMENT

Glasgiven Contracts Ltd expects suppliers to:

- Comply with all applicable employment legislation
- Prohibit forced or compulsory labour
- Prohibit child labour
- Pay lawful wages
- Provide safe working conditions
- Treat workers fairly
- Cascade equivalent standards throughout their own supply chains

Failure to meet these standards may result in suspension or termination of the business relationship.

7.0 REPORTING

You must ensure that you read, understand and comply with this policy.

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 manager or the Finance Manager 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 parts of our business or supply chains immediately through line management or the Whistleblowing Policy.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Finance Manager.

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. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

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

All reports are investigated promptly and confidentially. Individuals raising concerns in good faith are protected from retaliation.

8.0 MEASURING EFFECTIVENESS

Effectiveness is monitored through KPIs including:

	TARGET
• Percentage of new suppliers subject to due diligence	100%
• Percentage of relevant contracts containing modern slavery clauses	100%
• Annual review of high-risk suppliers	100%
• Employee training completion rates	100%
• Number of reported concerns and investigations	100%
• Corrective actions completed	100%
• Annual Board review and approval	100%

9.0 CONTINUOUS IMPROVEMENT

Audit findings, incidents and supplier reviews are used to improve controls, training and procurement processes. This policy is reviewed annually or sooner following legislative or organisational change.

10.0 DATA PROTECTION

We are committed to applying this policy in line with the General Data Protection Regulations as set out in our General Data Protection Policy.

11.0 BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Suppliers or contractors failing to meet expectations may be suspended or we may terminate contracts and remove from the approved supplier list if they breach this policy.

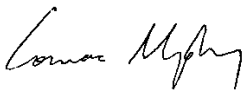
12.0 REFERENCES

This policy reinforces other relevant policies including the:

- Human Rights Policy
- Dignity at Work Policy
- Equal Opportunities Policy
- Whistleblowing Policy
- Procurement Policy
- Code of Conduct
- Recruitment Policy
- Data Protection

This Policy will be reviewed and updated on an annual basis and has been approved by the Board of Glasgiven Contracts Ltd and signed on behalf of the board by the Managing Director.

Nothing in this policy says or implies that a contract exists between the Company and its employees or that participation in this program is a guarantee of continued employment with the Company.



Signed: _____

Cormac Murphy
Managing Director

Date: ***17/07/2026***

Review Date: May 2027