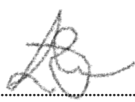




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Modern Day Slavery Policy

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AUTHORISED BY	CEO	
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1.0 Purpose and Scope

This policy sets out SEMCO's position on modern slavery and human trafficking, and the steps taken to minimise the risk of it occurring in our business or supply chains. It is made having regard to section 54 of the Modern Slavery Act 2015.

SEMCO has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all 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.

This policy applies to all individuals working for or on behalf of SEMCO, including employees, directors, agency workers, temporary workers, contractors and subcontractors. It does not form part of an employee's contract of employment and may be amended at any time.

SEMCO's turnover is currently below the £36 million threshold at which an annual transparency statement becomes a statutory requirement. Supply chain due diligence obligations apply regardless of turnover, and a transparency statement will be published when the threshold is reached.

2.0 What Modern Slavery Is

Modern slavery covers slavery, servitude, forced or compulsory labour and human trafficking. It is often hidden, and the people affected frequently do not identify themselves as victims.

Indicators that may suggest modern slavery include:

- Several workers paid into the same bank account, or an account not in the worker's own name
- A third party speaking for a worker, controlling their documents, transport or accommodation
- Workers who appear withdrawn, fearful, poorly nourished or inappropriately dressed for the work
- Signs of physical injury, or reluctance to discuss living arrangements
- Workers dropped off and collected at unusual hours by the same vehicle
- Unwillingness or inability to provide identity documents, or documents held by someone else
- Unusually long hours, or reluctance to take breaks or leave

No single indicator proves modern slavery. If something does not look right, report it.

3.0 Our Business and Supply Chain Risk

SEMCO manufactures volumetric modular buildings at Avis Way and delivers construction projects across the South East. The activities presenting the highest inherent risk are:

- Labour supplied through agencies, gangmasters or labour-only subcontractors
- Subcontracted site trades, particularly where work is sub-subcontracted beyond the first tier
- Cleaning, security, catering and waste services
- Materials and components sourced from concealed, lower-tier or overseas suppliers

4.0 Supplier Due Diligence

Due diligence is carried out on all new suppliers during onboarding and on existing suppliers at regular intervals. This includes:

- Assessing the risk presented by the goods or services provided
- Reviewing the supplier's employment practices, health and safety standards and labour relations
- Requiring improvements where employment practices fall short
- Sanctioning or ending the relationship with suppliers who fail to improve

All suppliers are required to confirm that:

- They do not use forced, compulsory, trafficked or slave labour
- Their workers work voluntarily and are free to leave
- Each worker has a contract containing a reasonable notice period
- They do not require workers to lodge a deposit or bond, and do not withhold wages
- They do not require workers to surrender passports or work permits as a condition of employment
- They pay at least the national minimum or living wage as applicable, and cascade these requirements to their own suppliers

5.0 Our Own Employment Practices

Within SEMCO:

- Right to work checks are carried out on every individual before they start work, and records retained
- Every employee has a written contract of employment, is paid at least the applicable national minimum or living wage, and is paid directly into their own bank account
- No worker pays a fee to work, and no deposit or bond is held as a condition of employment
- Working time and rest break entitlements are observed
- Agency workers are engaged only through agencies that have been assessed under section 4.0

6.0 Responsibilities

Role	Responsibility
CEO	Owner of this policy. Accountable for compliance, for reporting to the authorities, and for the transparency statement when required
Directors	Day-to-day responsibility for implementing this policy, monitoring its effectiveness and auditing internal controls
Contracts Manager and procurement	Carry out supplier due diligence, include modern slavery obligations in subcontract terms, and verify labour arrangements at tier two and beyond where risk is identified
Site Managers and Production Manager	Remain alert to indicators on site and in the factory, check that those attending are who they are recorded as being, and report concerns immediately

Role	Responsibility
Line managers	Ensure their teams understand this policy and the indicators of modern slavery
All individuals	Avoid any activity that might breach this policy and report concerns at the earliest possible stage

7.0 Reporting a Concern

If you believe or suspect that modern slavery is occurring in any part of SEMCO's business or supply chain, at any tier, notify a director as soon as possible or report it under the Whistleblowing Policy. Do not confront the suspected victim or the person you suspect — a well-meant intervention can place a vulnerable person at greater risk.

Where there is an immediate risk to a person's safety, call the police on 999. The Modern Slavery Helpline can be contacted on 08000 121 700 and is available at all hours.

SEMCO supports anyone who raises a genuine concern in good faith, even if it proves mistaken, and will ensure that no one suffers detrimental treatment for doing so. If you believe you have suffered such treatment, inform a director immediately; if the matter is not remedied, raise it formally under the Grievance Procedure.

If modern slavery is identified, SEMCO will act immediately against the supplier or individual concerned, report the matter to the authorities, and prioritise the safety and support of the people affected.

8.0 Training and Awareness

All staff are made aware of this policy at induction. Those involved in procurement, subcontract management and site supervision receive additional guidance on identifying and responding to indicators of modern slavery. Training records are retained in ArchDesk.

9.0 Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. SEMCO may terminate its relationship with any other individual or organisation working on its behalf that breaches this policy.

10.0 Related Documents and Review

- Employee Code of Conduct · Anti-Bribery Policy · Fraud Prevention Policy
- Whistleblowing Policy · Fairness, Inclusion and Respect Policy · Equal Opportunities and Diversity Policy
- Pre-qualification questionnaire · Legal Register

This policy is reviewed at least annually by the CEO, and additionally following any change in relevant legislation or any concern raised under it. Evidence of review is retained in ArchDesk.

Individuals are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to a director.