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Modern Slavery Policy Statement

Modern slavery is an umbrella term that encompasses a wide spectrum of crime, including human trafficking, slavery, servitude, and forced labour. The term refers to situations of exploitation that a person cannot leave due to coercion, use of force, abuse of vulnerability, deception, or other means. It is the illegal exploitation of people for personal or commercial gain and is a violation of fundamental human rights.

Some estimates suggest that there are approximately 50 million people living in slavery across the world, many of whom will be working to produce the goods and services which are bought and sold every day.

Worldwide, the International Labour Organisation estimates hundreds of billions of illegal profits are generated by traffickers per year. Unscrupulous businesses who use slave labour undercut businesses and if this horrendous crime is to be eradicated from the UK and the rest of the world, government and businesses must work together

At Seddon Plant and Engineers Limited, we have adopted a proactive approach to mitigating modern slavery and all forms of corruption and bribery, directly and indirectly, associated with these criminal acts. While no such abuse is tolerated, an open and transparent approach is required by our customers and our suppliers, to ensure we take steps to identify and tackle any instances of modern slavery in our supply chain.

Modern slavery is so pervasive that it is likely to exist in the supply chains of the goods and services purchased by public bodies. We are committed to ensuring that taxpayers' money does not inadvertently fund this criminal activity and is committed to protecting vulnerable workers in its own supply chains from exploitation or harm.

Seddon Plant and Engineers Limited fully supports the government's objectives to eradicate modern slavery and human trafficking. We believe that everyone has a right to be treated with dignity and respect at all times and under all circumstances. Seddon Plant and Engineers Limited's Behaviour Code states that everyone working for us, is responsible for ensuring we meet the highest ethical standards of integrity, courtesy and mutual respect

Modern slavery is the term used within the UK to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking and the associated criminal offences are defined within the Modern Slavery Act 2015 (the 'Act'). 3.2 Human trafficking is where a person arranges, or facilitates, the travel of another person with a view to that person being exploited.

This policy provides a framework to ensure :

- All personnel understand and are aware of their responsibilities in relation to modern slavery.
- The development of a strategic approach to identifying and tackling any modern slavery within our supply chains.
- Reporting of instances (or concerns) of modern slavery.

Responsibilities and Accountabilities

Seddon Plant and Engineers Limited recognises that it is responsible for promoting ethical business practices and policies that protect workers from being abused or exploited.

The prevention, detection and reporting of modern slavery in any part of our business or its supply chain is the responsibility of all those working for us or on our behalf. Any employee must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

Therefore, this policy applies to all persons working for or on behalf of Seddon Plant and Engineers Limited, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents and contractors.

The Management Board have overall responsibility for ensuring this policy complies with Parliament's legal and ethical obligations, and that all those under our control comply with it. The Management Board currently has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any related queries, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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Contractor Responsibilities

Seddon Plant and Engineers Limited requires all organisations with whom it is engaged to ensure that their goods, services, materials and labour-related supply chains :

- Fully comply with the Act.
- Are clear, transparent, accountable and auditable.
- Are free from ethical ambiguities.

Seddon Plant and Engineers Limited expects that its contractors operate to the highest level of ethical standards and will hold their own suppliers to the same high standards.

All contractors must pay their dedicated staff working in London at least the London Living Wage, or the UK Living Wage for dedicated staff working outside London. Paying a Living Wage is a protective mechanism against exploitation as it ensures staff members are paid sufficiently to meet their basic needs.

Contractors who supply goods or services deemed to be at particular risk of modern slavery (or have a high contract value) may be invited to complete the Government Modern Slavery Assessment Tool. Seddon Plant and Engineers Limited may also encourage contractors that do not fall within the scope of the Act to complete this assessment. This assessment will help us to assess the capacity of the contractor to manage and prevent the risks of modern slavery. It will also support us to work in partnership with contractors to improve protections and reduce the risk of exploitation of workers in their supply chains.

Seddon Plant and Engineers Limited acknowledges that contractors may be at different stages of their journey towards having more ethical supply chains but expects to see them demonstrate continuous improvement in how modern slavery risks are mitigated.

Seddon Plant and Engineers Limited may require contractors who engage workers through a third party to obtain that third party's agreement to adhere to this policy and demonstrate how they seek to tackle any modern slavery within their supply chain.

Consistent with this approach, Seddon Plant and Engineers Limited may require employment and recruitment agencies, and other third parties supplying workers to teams in either Administration, to demonstrate their compliance with this policy.

Awareness and Training

Seddon Plant and Engineers Limited will raise awareness of this policy (and the Act) by notifying contractors, suppliers and other organisations with which we regularly engage.

The policy will be published on the website and the intranet.

Seddon Plant and Engineers Limited will look for opportunities to raise awareness of modern slavery and human rights abuses throughout the community. Appropriate training and guidance will be provided for all staff.

Training will include how to identify the risks of modern slavery and ensure that suspected instances are handled correctly. Supplementary training will be made available for commercial and procurement staff. This training will be mandatory for contract managers responsible for high-risk or high-value contracts.

Seddon Plant and Engineers Limited will provide modern slavery information, advice and guidance to contractors. Where feasible, we may also extend modern slavery training to contractors (however, contractors will remain responsible under the Act and retain their overall responsibility for providing training internally to their staff).

Seddon Plant and Engineers Limited will maintain records of all members who have completed modern slavery training.

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Assurance and Transparency

Seddon Plant and Engineers Limited has committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within either Administration or in any of our supply chains.

Seddon Plant and Engineers Limited takes a risk-based approach to its procurement, contract management and supply chain management processes in relation to modern slavery and keeps them under continuous review.

As part of ongoing risk assessment and due diligence processes, Seddon Plant and Engineers Limited will consider whether circumstances warrant the auditing of contractors to demonstrate their compliance with this policy.

To supplement this policy, Seddon Plant and Engineers Limited will voluntarily publish an annual Modern Slavery Statement for each financial year, which will include details of activities undertaken by the company and its supply chains to combat modern slavery.

The Statement will be published on the website and the Modern Slavery Registry within 6 months after the last financial year end.

Workplace Equality Network Support

Seddon Plant and Engineers Limited will work closely with the Workplace Equality Networks (WENs) to consider how workers in their supply chain may be more vulnerable to exploitation.

The Office of the Immigration Services Commissioner (OISC), and or Immigration Solicitors will be engaged in particular, as workers may be more vulnerable due to their immigration status, gender, ethnicity, age or levels of educational attainment. Workers on temporary and seasonal contracts are also associated within being at higher risk due to the additional risk of exploitation through labour intermediaries.

Non-Compliance, Reporting and Victim Support

If any member of the is discovered to have breached this policy, then appropriate action will be taken.

If any contractor is found to have breached this policy, then appropriate action will be taken; this may range from considering the possibility of breaches being remediated, to terminating agreements.

Individuals who have reasonable suspicion or evidence of modern slavery or noncompliance with the Act must immediately report their concerns to Senior Management. If the incident has a high level of threat or risk of harm, individuals must always refer the case to the emergency services on 999 as a first port of call. Children should always be referred into the authorities immediately.

In line with our Company Principles, Seddon Plant and Engineers Limited will take a victim-centred approach in order to protect any victims of modern slavery from further harm or vulnerability. We will always act on a case-by-case basis, considering individual circumstances. We aim to follow a collaborative approach with our supply chain, only terminating contracts as a last course of action.


Finally, we commit to working with partners through a multi-stakeholder approach and continuously learning and adapting based on our experiences. We require suppliers to act in accordance with these Principles where supply chain incidents require remediation.

This policy will be reviewed on an annual basis, to establish whether Seddon Plant and Engineers Limited's approach continues to follow best practice by :

- Assessing and interpreting any recent or emerging case law and best practice.
- Benchmarking activities against statements and action plans undertaken by similar public and private organisations.

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- Re-evaluating the risk of non-compliance as part of our annual risk management and assurance processes.

SIGNED :  **DATE :** 15.01.2025

NAME : Chris Derbyshire **POSITION :** Joint Managing Director

UPDATES OF POLICY			
Issue No	Description Of Review	Date Of Issue	Action
1	Initial Draft	Jan 2025	