

PDR's Modern Slavery Act Policy Statement

Policy Statement

This Policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants, and business partners. It sets out the steps PDR Construction Limited will take to ensure that slavery and human trafficking is not taking place in any of its business activities and supply chain partners.

Introduction

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

The Company has a zero-tolerance approach to modern slavery and is committed to acting ethically, with integrity and transparency in all our business dealings and relationships and likewise expects our people, suppliers, and sub-contractors to adopt the same approach.

Organisational Structure & Supply Chains

PDR Construction Limited undertakes building, construction projects throughout the UK. We operate across a number of broad sectors, including hotel and leisure, retail and commercial, industrial, health and education, motor retail and residential. The Company's zero tolerance approach to modern slavery will be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

Due Diligence Processes

In order to ensure prevention of slavery or human trafficking taking place within PDR, or its supply chain, we shall:

- Publish this Policy Statement on PDR Construction's Website's Homepage;
<https://pdrconstruction.co.uk/wp-content/uploads/2021/04/Modern-Slavery-Act-Policy-Statement-2021.pdf>
- Publish this Policy Statement on the Government's Modern Slavery Statement Registry website;
<https://modern-slavery-statement-registry.service.gov.uk/viewing/statement-summary/zEBPMqMy/2021>
- Ensure our Supply Chain [Suppliers & Sub-Contractors] Assessment process checks their compliance with the Modern Slavery Act 2015, where applicable.
- Site H&S Inspection Audits to be undertaken by our Health & Safety Team to ensure that the Site Management Teams are displaying awareness/helpline information around the site and that site inductions are taking place raising modern slavery awareness.
- Ensure that our recruitment processes are transparent, reviewed regularly, and that offers of employment are given directly to candidates. We will conduct legal checks, vetting new employees prior to starting work, to confirm their identities e.g. Proof of Right to Work in the UK.
- Conduct reviews of Agency Labour Suppliers to ensure compliance via the Human Resources Team/Senior Buyer. Where non-compliances are found, PDR will invoke sanctions, which may include working with those suppliers to become fully compliant or remove from our Preferred Supplier List.

Responsibility for the Policy

It is the responsibility of ALL PDR personnel, particularly individuals focussed on our estimating/procurement and those in operational site teams, to maintain PDR's duties in respect of the Modern Slavery Act 2015. Directors and Senior Managers hold special responsibilities to hear, support and investigate allegations by those raising concerns in compliance with the Act and our related Whistleblowing Policy.

The Board of Directors has overall accountability for ensuring that this Policy complies with the Company's legal and ethical obligations. This statement is reviewed and updated on an annual basis to reflect any changes and/or continuous improvement measures and approved by the Board of Directors.

Risk Assessment & Compliance

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

We encourage anyone who has a genuine concern to report it to their Line Manager or the Human Resources Manager, who in turn are required to act and ensure that no one suffers detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

You must also raise any concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains immediately. You can also contact the government's **Modern Slavery Helpline on 0800 0121 700** for further information and guidance on modern slavery.

Training and Communication for Staff

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases. Additionally, we will ensure: -

- Visibility of the Policy accessed via our Intranet and on Company Notice Boards
- Line Managers across the Company undertake e-learning courses, particularly those involved in recruitment activities, direct or indirect including workers secured via recruitment agencies
- We communicate to staff to read the Statement and Policy and confirm understanding
- Modern Slavery Awareness Training will be given to all employees
- All new employees undertake a thorough induction process to learn about Company Policies and to become familiarised with the Modern Slavery Act, and expected standards of behaviour.

Breach of the Policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate without financial penalty its commercial relationship with suppliers, contractors, and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

Measuring Effectiveness

This policy will be reviewed annually by the Directors who take full responsibility for its implementation to ensure that PDR and our Supply Chain are free of slavery and human trafficking.

Continual Improvement Strategy

Additionally, as part of our continuous improvement strategy, we will continue to strive to improve upon our systems and processes to demonstrate that we operate our business ethically, responsibly, and sustainably. This year the following improvements have been made: - Incorporated Modern Slavery into Site Inductions for All workers, Identified Training for Heads of Departments, updated clauses in Supplier Contracts, added further questions to Supplier & Sub-Contract competency assessments, and rolled out a Modern Slavery campaign.

Approved: *P. Dransfield*
Paul Dransfield [Managing Director]

Date: 27.10.21