

## MODERN SLAVERY AND HUMAN TRAFFICKING

The Directors of Clegg Group Ltd (Clegg Construction Ltd, Clegg Food Projects Ltd) are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business and will take a zero-tolerance approach to any modern slavery or human trafficking. Our approach to achieving this aim reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains.

### Our Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk:

- Our sites and working environments will be managed by Clegg employed personnel to ensure optimum control of the work environment and who works within it.
- Where practicable we will continue to build long-standing relationships with contractors and suppliers and make clear our expectations of business behaviour.
- With regards to national or international supply chains, our point of contact is preferably with a UK company or supplier and we expect these entities to have suitable anti-slavery and human trafficking policies and processes in place. We expect each entity to adopt 'one-up' due diligence on the next link in the chain as a minimum requirement. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links within the supply chain.
- We have in place systems to encourage the reporting of concerns and the protection of whistleblowers.
- We monitor ethical standards across the business on a regular basis both internally and via external third-party audits. Sites undergo unannounced Inspections by our own HSEQ Department and external health and safety consultants. Both organisations will report back on any issues relating to social and human behaviour common with slavery and human trafficking.

### Our Expectations of our Employees

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

If any member of staff believes or suspects a breach of, or conflict with, this policy has occurred or may occur, you must notify the Director responsible for your business function. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act or the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, you should raise it with your relevant Director.

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.

Clegg Group Limited is committed to ensuring no one suffers any 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.

Across Clegg Group the following internal policies are operated to ensure that business is conducted in an ethical and transparent manner:

1. Right to Work Checks - Eligibility checks for the right to work in the UK are conducted for all employees prior to them commencing work, to safeguard against modern slavery and individuals being forced to work against their will.
2. Our Right to Work Checks will also ensure that no-one under the age of 16 is employed by the Company in any capacity.
3. Where appropriate, employees working on our sites will have the appropriate CSCS certification level for their on-site activity, which includes photo identification and evidence that the appropriate tests/qualification have been obtained in order to obtain a CSCS card.
4. A whistleblowing policy is in place so that all employees know that they can raise concerns about practices within our business or supply chain, without fear of reprisals.

### **Contractor and Supplier Adherence to our Values**

We expect all those in our supply chain and contractors to comply with our values. The supply chain security and integrity are a crucial component of our business model. Robust technical and traceability systems ensure that our contractors and suppliers are responsibly sourced from Organisations/Suppliers whose values are aligned with our own. As a company we use Labour Providers and contractors to supply a large percentage of our workforce. It is the responsibility of each Labour Provider and contractor to conduct the appropriate right to work checks before employment begins for any workers they use to carry out work on our sites.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff, so that they know how to identify exploitation and modern slavery and how to report suspected cases. All Directors have been briefed on the subject.

### **Breach of the policy**

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

The Company may terminate 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 or human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

Signed on behalf of Clegg Group Limited

Date 02 January 2025



Keith Anderson  
Group Commercial  
& Financial Director



Simon Blackburn  
Group Director



Stephen Giltrap  
Group Director