

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Policy Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. Delton Contracts Services Ltd is committed to ensuring that modern slavery and human trafficking are not present within our business operations or our supply chains. We maintain a zero tolerance approach to all forms of slavery, including forced labour, servitude, and human trafficking.

Our Commitment

We recognize that the construction and labor sectors face specific risks regarding modern slavery. We are committed to acting ethically and with integrity in all our business dealings.

To safeguard against these risks, we implement robust systems and controls, ensuring transparency across our recruitment processes and our relationships with third-party suppliers.

Responsibility for the Policy

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on the issue of modern slavery in supply chains.

Due Diligence and Risk Management

To identify and mitigate risk, Delton Contracts Services Ltd performs the following actions:

- **Recruitment:** We operate a stringent recruitment process. This includes verifying the "Right to Work" in the UK for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- **Induction:** All new staff undergo an induction process that includes awareness of modern slavery, how to spot the signs of exploitation, and how to use our reporting channels.
- **Site Inspections:** We conduct regular site-based checks and audits to monitor the welfare of our workforce and ensure that no individuals are subject to coercion or unsafe working conditions.
- **Supply Chain:** We expect the same high standards from all of our contractors, suppliers, and other business partners. We perform risk mapping of our supply chain and require our primary suppliers to confirm their own compliance with the Modern Slavery Act.

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Reporting Concerns

We encourage all employees, contractors, and business partners to report any concerns regarding modern slavery within any part of our business or supply chain at the earliest possible stage.

Reports can be made directly to a Director or through the company's Whistleblowing Policy.

We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery is or may be taking place.

Training and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we provide training to our staff. We also communicate our zero-tolerance approach to all suppliers, contractors, and business partners at the outset of our business relationship and reinforce it as appropriate thereafter.

Performance Indicators

We will monitor the effectiveness of our efforts by:

- Reviewing our recruitment and payroll records to ensure 100% compliance with "Right to Work" and "National Minimum Wage" legislation.
- Monitoring reports received through our internal whistleblowing and grievance procedures.
- Conducting annual reviews of our supply chain risk assessments.

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Approved by: Gurbakhs Singh

Position: Managing Director

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| Approved by | G.Singh Director | Signed:  | Date 6/3/2025 |
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Delton Facilities & Management (Trading name of Delton Contacts Services Ltd.)

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