



Modern Slavery and Human Trafficking Policy

Version: 1.0

Date: July 2026

Review January 2027

1. Purpose

This policy sets out Buxted Construction Ltd.'s approach to preventing modern slavery and human trafficking within our business and supply chain. We are committed to ethical working practices and ensuring that slavery and human trafficking have no place in our operations or those of our subcontractors and suppliers.

2. Scope

This policy applies to all employees, contractors, subcontractors, suppliers, and any other third parties working on behalf of Buxted Construction Ltd.

3. Policy Statement

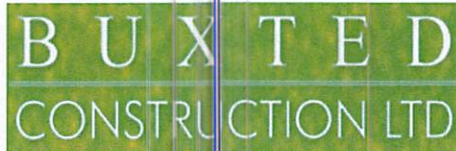
Buxted Construction Ltd acknowledges the responsibility to comply with the Modern Slavery Act 2015 and is committed to acting transparently, ethically, and with integrity in all our business dealings. We do not tolerate modern slavery or human trafficking in any form.

We take proactive steps to ensure that modern slavery is not present in our own operations or in those of our supply chain, including labour-only subcontractors and materials providers.

4. Our Business & Supply Chains

Buxted Construction Ltd is a UK-based construction firm providing [residential/commercial/infrastructure] construction services. Our supply chain includes:

- Labour suppliers and subcontractors



- Material and equipment suppliers
- Professional services (e.g. architects, consultants)
- Temporary labour agencies

We recognise the construction industry is particularly at risk of forced labour and exploitation due to the high use of subcontracted and migrant labour.

5. Risk Management and Due Diligence

We undertake the following steps to assess and manage the risk of modern slavery:

- Vetting subcontractors and suppliers through a Pre-Qualification Questionnaire (PQQ), including questions on modern slavery compliance
- Requiring subcontractors to sign up to our Code of Conduct and Modern Slavery Declaration
- Conducting spot checks on construction sites to ensure workers have the right to work and are employed voluntarily
- Reviewing the use of labour agencies and ensuring they comply with UK employment law

6. Training & Awareness

All site supervisors, procurement staff, and HR personnel receive training on:

- Identifying signs of modern slavery and exploitation
- Reporting and escalation procedures
- Ensuring fair recruitment and payment practices

Posters and toolbox talks are used to raise awareness on construction sites.

7. Reporting Concerns

We encourage staff, subcontractors, and the public to report concerns about modern slavery through the following channels:

- Direct reporting to line manager or Safety team
- Email: hr@buxtedconstruction.co.uk

All reports will be treated in confidence and investigated thoroughly. No whistleblower will suffer any detriment for reporting genuine concerns.

8. Responsibilities

- **Managing Director:** Overall accountability for ensuring this policy is implemented and reviewed.
- **Health & Safety Manager:** Monitors compliance, delivers training, and conducts audits.
- **Procurement Team:** Ensures suppliers and subcontractors meet our anti-slavery requirements.

9. Monitoring & Review

This policy will be reviewed annually and updated where necessary to reflect changes in legislation, guidance, or company operations. Key performance indicators (KPIs) may include:

- Number of supplier audits conducted
- Number of concerns reported/investigated
- Staff trained

10. Related Policies

- Anti-Bribery & Corruption Policy
- Code of Conduct
- Equality, Diversity & Inclusion Policy
- Grievance Procedure
- Whistleblowing Policy

James Hanifin – Managing Director

July 2026



