



## Modern Slavery and Ethical Trading Policy

*Anti-Slavery, Human Trafficking and Responsible Business Conduct*

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| Document Reference       | SB4G-ETH-POL-001                                                                       |
| Document Title           | Modern Slavery and Ethical Trading Policy                                              |
| Version                  | 1.0                                                                                    |
| Status                   | Approved – for internal use and public disclosure                                      |
| Issue Date               | 07 July 2026                                                                           |
| Review Date              | 07 July 2027 (annually, aligned to the management review cycle)                        |
| Policy Owner             | Anthony Litchfield, Managing Director                                                  |
| Prepared / Maintained by | Adam Baxter, Head of Compliance & Project Coordination (IMS Management Representative) |
| Related System           | Integrated Management System (SB4G-IMS-001)                                            |

### 1. Policy Statement

SB4 Construction Group Ltd (“SB4”, “the Company”, “we”) is committed to conducting its business ethically, with integrity and transparency, and to preventing modern slavery, servitude, forced or compulsory labour and human trafficking in every part of our operations and supply chains. We recognise that we all have a responsibility to be alert to the risks, however small, and to act where we suspect that a person's freedom or dignity is being exploited.

We have a zero-tolerance approach to modern slavery in all its forms. We expect the same high standards from our subcontractors, suppliers, consultants and business partners, and we will not knowingly work with any organisation that is involved in, or fails to take reasonable steps to prevent, slavery or human trafficking.

This policy sits within our Integrated Management System (IMS) and supports our accreditations, including **SSIP and Constructionline Gold**, and our obligations under the Building Safety Act 2022. It is published on our website in the interests of openness and accountability.

### 2. Purpose and Scope

The purpose of this policy is to set out SB4's commitment, expectations and controls in relation to modern slavery and to responsible, ethical business conduct more broadly. It explains how we identify and manage risk, how our people and partners are expected to behave, and how concerns can be raised.

This policy applies to all individuals working for or on behalf of SB4 at all levels, including directors, employees, site-based staff, agency and temporary workers, self-employed operatives, subcontractors, suppliers, consultants and any other third party engaged in the delivery of our projects across England and Wales, in the commercial, residential, agricultural and fit-out sectors, whether SB4 is acting as Principal Contractor, Contractor or Project Management Consultant.

### 3. Our Organisation

SB4 Construction Group Ltd is a construction company based in Llanfyllin, Powys, delivering projects across England and Wales. Our work spans the commercial, residential, agricultural and fit-out sectors, and we act variously as Principal Contractor, Contractor and Project Management Consultant under the Construction (Design and Management) Regulations 2015 and the Building Safety Act 2022.

As a small business, our workforce is directly known to management and our supply chain is relatively concentrated. This gives us close oversight of the people and organisations we work with. At the same time, we recognise that construction is widely acknowledged to be a higher-risk sector for labour exploitation, particularly through the use of subcontracted and agency labour, and we therefore treat the management of this risk as a genuine and continuing priority rather than a paper exercise.

### 4. Legal and Regulatory Framework

We conduct our business in accordance with all applicable laws. In relation to modern slavery and ethical conduct, the principal legislation we have regard to includes:

- **Modern Slavery Act 2015** – which consolidates the offences of slavery, servitude, forced or compulsory labour and human trafficking, and (under Section 54) introduces transparency in supply chains reporting;
- Employment Rights Act 1996 and the National Minimum Wage Act 1998 – protecting fair pay and terms of employment;
- Immigration, Asylum and Nationality Act 2006 – governing right-to-work checks;
- Bribery Act 2010 – prohibiting bribery, corruption and improper business advantage;
- Equality Act 2010 – protecting against discrimination and promoting fair, equal treatment;
- Health and Safety at Work etc. Act 1974 and the CDM Regulations 2015 – protecting the welfare of workers on our sites.

The mandatory publication duty under Section 54 of the Modern Slavery Act 2015 applies to commercial organisations with an annual turnover of £36 million or more. **SB4's turnover falls below this threshold, and we are therefore not legally required to publish a statutory modern slavery statement. We have chosen to adopt and publish this policy voluntarily** as a matter of good practice, to meet the expectations of our clients and prequalification schemes, and because we believe it is the right thing to do.

*We monitor developments in this area. We note the updated Home Office statutory guidance on transparency in supply chains issued in March 2025, and proposed reforms to the modern slavery regime before Parliament that may, in time, strengthen reporting duties and introduce penalties. We will review this policy and our practices in light of any changes in the law.*

### 5. Definitions

For the purposes of this policy:

- **Modern slavery** is an umbrella term covering slavery, servitude, forced or compulsory labour and human trafficking. A person is enslaved where they are exploited by others for personal or commercial gain and cannot freely leave.
- **Forced or compulsory labour** is work or service exacted from a person under threat or menace, and to which they have not offered themselves voluntarily.
- **Human trafficking** is the arranging or facilitating of the travel of another person with a view to their exploitation.

- **Supply chain** means all subcontractors, labour providers, suppliers of materials, plant and services, and other third parties involved in delivering our projects.

## 6. Roles and Responsibilities

Preventing modern slavery and upholding ethical conduct is the responsibility of everyone connected with SB4. Specific responsibilities are allocated as follows:

| Role                                                                                              | Responsibility                                                                                                                                   |
|---------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Managing Director<br/>(Anthony Litchfield)</b>                                                 | Holds overall accountability for this policy, provides the resources and leadership to implement it, and approves it on behalf of the Board.     |
| <b>Construction Director<br/>(Adam Curtis)</b>                                                    | Ensures the policy is applied on projects and that site management maintains vigilance over labour arrangements.                                 |
| <b>Head of Compliance &amp; Project Coordination (Adam Baxter, IMS Management Representative)</b> | Maintains this policy within the IMS, monitors compliance, coordinates due diligence and training, and reviews the policy at least annually.     |
| <b>Accounts / Procurement<br/>(Debbie Litchfield)</b>                                             | Carries out supplier and subcontractor due diligence, embeds ethical requirements into orders and appointments, and retains supporting evidence. |
| <b>Project &amp; Site Managers<br/>(J. Charlesworth, R. Jones, S. Edwards, S. Gorman)</b>         | Verify right-to-work and worker welfare on site, remain alert to indicators of exploitation, and report concerns promptly.                       |
| <b>All staff, workers and partners</b>                                                            | Comply with this policy, act with integrity, and report any suspicion of modern slavery or unethical conduct.                                    |

*Note: names are shown here for clarity; roles rather than individuals hold the responsibilities.*

## 7. Supply Chain and Procurement Due Diligence

We manage the risk of modern slavery entering our business primarily through the way we select and manage our supply chain. Proportionate to our size and the nature of our projects, we:

- maintain an Approved Supplier List and evaluate suppliers and subcontractors before engagement, with re-evaluation on an annual cycle;
- expect subcontractors and labour providers to operate lawfully, pay at least the National Minimum / Living Wage, and comply with this policy;
- include ethical and anti-slavery expectations within our procurement and subcontract arrangements;
- give preference to established, reputable suppliers and are cautious of arrangements involving unexplained sub-tiers of labour, unusually low pricing or opaque payment routes;
- reserve the right to terminate our relationship with any party found to be involved in modern slavery.

## 8. Recruitment and Employment Practices

We are committed to fair and lawful employment. We carry out right-to-work checks on those we engage, provide clear terms of engagement, and pay in line with legal requirements. We do not tolerate the withholding of wages, identity documents or personal papers, the charging of recruitment fees to workers, or any arrangement that restricts a worker's freedom to leave their employment.

Where we use agency or subcontracted labour, we expect the same standards to be met and evidenced by those who supply that labour to us.

## 9. Recognising the Signs on Our Projects

We ask everyone on our sites to be alert to possible indicators of modern slavery, which can include:

- a worker appearing withdrawn, frightened, or unable to speak for themselves;
- signs of physical or psychological abuse, or poor and unsafe living conditions;
- several workers being dropped off and collected together at unusual times, or living at the same address;
- wages being paid into a single bank account for multiple workers, or workers having no access to their own earnings or documents;
- a worker being unusually reliant on, or controlled by, another individual.

These signs are not proof of exploitation, but they warrant attention. Anyone who notices such indicators should raise them without delay through the routes set out below.

## 10. Ethical Business Conduct

Beyond modern slavery, SB4 is committed to conducting all of its business honestly and ethically. This commitment covers, in particular:

### 10.1 Anti-Bribery and Corruption

We operate a zero-tolerance approach to bribery and corruption in accordance with the Bribery Act 2010. We do not offer, give, solicit or accept bribes or improper inducements, and gifts or hospitality must never be used to influence a business decision. Any gift or hospitality offered or received must be reasonable, transparent and properly recorded.

### 10.2 Fair Competition and Honest Dealing

We compete fairly, price our work honestly, and represent our capabilities and accreditations truthfully. We honour our commitments to clients, subcontractors and suppliers and expect the same in return.

### 10.3 Conflicts of Interest

Staff must declare any personal, financial or family interest that could conflict, or appear to conflict, with the interests of SB4 or our clients, so that it can be managed openly.

### 10.4 Human Rights, Equality and Respect

We treat everyone with dignity and respect and are committed to equality of opportunity and a working environment free from discrimination, harassment and victimisation, in line with the Equality Act 2010.

### 10.5 Data Protection and Confidentiality

We handle personal and commercial information responsibly and in accordance with UK GDPR and the Data Protection Act 2018, consistent with our wider information security commitments under the IMS.

## 11. Training and Awareness

We ensure that our people understand the risks of modern slavery and their responsibilities under this policy. Awareness is provided to staff appropriate to their role, with particular attention given to those involved in procurement, recruitment and site supervision. This policy is communicated to our workforce

and made available to our supply chain, and is reinforced through toolbox talks and induction where relevant.

## 12. Raising Concerns

We encourage anyone who has a concern about modern slavery, exploitation or unethical conduct connected with SB4 to speak up. No one will suffer any detriment or disadvantage for raising a genuine concern in good faith, even if it later proves to be mistaken.

Concerns should be raised with the Head of Compliance (Adam Baxter) or any director. Where you believe a person is in immediate danger, contact the emergency services on 999. Concerns about modern slavery can also be reported to the **Modern Slavery & Exploitation Helpline on 08000 121 700**, which operates confidentially and around the clock.

## 13. Monitoring, Review and Continual Improvement

This policy is reviewed at least annually as part of our management review cycle, and sooner if there is a significant change in our business, our supply chain or the law. Its effectiveness is monitored through supplier evaluation, the handling of any concerns raised, and internal audit within the IMS. As a growing business, we are committed to strengthening our controls over time in a way that is proportionate and meaningful.

## 14. Approval

This policy is approved and endorsed by the Board of SB4 Construction Group Ltd and has effect from the issue date shown above.

|          |                                                                                     |
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| Signed   |  |
| Name     | Anthony Litchfield                                                                  |
| Position | Managing Director                                                                   |
| Date     | 07 July 2026                                                                        |