

## Modern Slavery & Human Trafficking Policy

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| Document Name  | Modern Slavery Policy |
| Version Number | 2                     |

Delton Contracts Services Ltd is a specialist construction and contracting services company operating within the United Kingdom. We provide skilled and unskilled labour, subcontract services and associated construction support to clients across the construction and infrastructure sectors.

In conducting our business at every level—internally and externally, with employees, operatives, clients, suppliers and partners—we are committed to acting ethically and with integrity. We recognise our responsibility to help prevent modern slavery and human trafficking, as defined under the Modern Slavery Act 2015, within our business operations and supply chains.

This policy applies to all employees, operatives, contractors, suppliers and any other parties working on behalf of Delton Contracts Services Ltd.

### **Our Commitment**

#### **Delton Contracts Services Ltd is committed to:**

- Complying fully with the requirements of the Modern Slavery Act 2015
- Preventing slavery, forced labour, servitude and human trafficking within our business and supply chains
- Acting transparently and responsibly in all business dealings
- Maintaining effective systems and controls to identify, assess and mitigate modern slavery risks

### **Integrity.**

#### **We demonstrate our commitment through the following actions:**

- Zero tolerance for modern slavery or human trafficking
- Risk assessments carried out to identify potential internal and external risks
- Ongoing review of suppliers, subcontractors and clients
- Maintenance of appropriate internal policies, including a Whistleblowing Policy, to encourage the reporting of concerns
- Prompt investigation of any allegations or suspicions of modern slavery

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### **Supply Chain Management**

Delton Contracts Services Ltd is committed to working collaboratively with our supply chain to ensure compliance with the Modern Slavery Act 2015.

#### **We will:**

- Engage only with suppliers and subcontractors who share our commitment to ethical labour practices
- Seek transparency within our supply chain regarding labour standards
- Take reasonable steps to ensure that goods and services are provided by workers acting freely and voluntarily
- Reserve the right to review, challenge or terminate relationships where modern slavery risks are identified

### **Responsibilities**

#### **Company Responsibilities**

- Ensure all operatives and workers engaged by Delton Contracts Services Ltd have the legal right to work in the UK
- Maintain appropriate recruitment, verification and compliance procedures

#### **Management Responsibilities**

- Managers and Directors are responsible for monitoring compliance with this policy
- Regular checks will be undertaken within the supply chain to identify potential risks
- Any concerns raised must be treated seriously and investigated promptly

#### **Employee & Operative Responsibilities**

- All employees, operatives and third parties are encouraged to report concerns or suspicions relating to modern slavery
- Concerns should be raised with a Director or senior manager without fear of retaliation

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### **Reporting of Incidents**

- All employees are required to report any suspected or actual breaches of the Modern Slavery Act 2015 to their immediate Manager or a Director
- Managers and Directors must escalate serious concerns and, where appropriate, report matters to the relevant authorities, including the Police, if a criminal offence is suspected

### **Training and Awareness**

Delton Contracts Services Ltd will ensure that:

- Suitable and sufficient training on modern slavery and human trafficking is provided to Managers and Directors
- Refresher training is undertaken at least every 12 months
- All operatives receive an overview of the Modern Slavery Act and this policy
- A copy of this Modern Slavery Policy will be provided upon written request within 7 days

### **Sustainability Commitment**

We recognise the important role we play in contributing to a more sustainable and ethical construction industry. This Modern Slavery Policy forms part of our wider sustainability and corporate responsibility strategy and will be reviewed regularly to ensure continued effectiveness.

### **Governance & Oversight**

The Directors of Delton Contracts Services Ltd are fully committed to ensuring compliance with both the letter and spirit of the Modern Slavery Act 2015.

Responsibility for overseeing and implementing this policy rests with the Board of Directors, who have the authority to enforce this policy across all areas of the business.

#### **Approved by:**

The Directors  
Gurbakhs Singh

Review cycle: Annual or as required by legislative change