

## Modern Slavery & Human Trafficking Policy

### What is the Modern Slavery Act 2015?

The Modern Slavery Act was introduced in 2015 which requires qualifying businesses to produce an annual statement setting out the steps they have taken to prevent modern slavery in their business and supply chains. It aims to ensure that businesses are transparent about what they are doing to tackle modern slavery and human trafficking.

### What does Modern Slavery and Human Trafficking mean?

Modern Slavery is a term used to encompass slavery, forced, compulsory labour, and human trafficking of children and adults, and any activity that leads to the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. It is a crime and a violation of fundamental human rights.

### Mitigating risks

Galaxy Construction Solutions and all subsidiaries have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our organisation or in any of our supply chains.

We are committed to ensuring there is transparency in our organisation and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we require our principal suppliers to confirm that they comply with the requirements of the Modern Slavery Act 2015.

We are committed to ensuring there is transparency in our organisation and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect that our suppliers will hold their own suppliers to the same high standards and that they also have suitable anti-slavery and human trafficking policies and processes.

To ensure there is understanding of the risks of modern slavery and human trafficking in our business and in our supply chains, we will provide training to members of our staff.

## Scope of the document

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, agency workers, contractors, external consultants and business partners.

## Roles and responsibilities

The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

Colleagues must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Colleagues are required to avoid any activity that might lead to, or suggest, a breach of this policy.

## Raising a concern

Should any colleague have any reasons to believe or suspect that a breach of this policy has occurred, or may occur in the future; they should notify their line manager or report the incident via the companies Whistleblowing Policy.

Colleagues are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains at the earliest possible stage.

If there is any uncertainty about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, this should also be raised.

We will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no-one suffers any detrimental treatment as a result of reporting in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If colleagues believe that they have suffered any such treatment, they should inform Human Resources or a senior manager immediately.

## Equality & Diversity

We are committed to respecting diversity in all aspect of our work and meeting our obligations under the Equality Act. In accordance with this we welcome feedback on any aspect of this policy where there is a question over its adherence to the above legislation.

## Data Protection

We are committed to applying this policy in line with our Data Protection regulations as set out in our Data Protection Policy.

## Recording and Monitoring

Reports of actual and potential breaches will be elevated to the Group Managing Director of Galaxy Construction Solutions.

## Policy Review

This policy along with other related supporting policies and procedures in use will be regularly reviewed and revised as and when necessary.



Tracy Shepherd  
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Galaxy Construction Solutions

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