



New Marlborough House, 90c Wrotham Road, Gravesend, Kent, DA11 0QQ

Modern Slavery and Human Trafficking Statement for the financial year 2025

Introduction

This statement is published on behalf of Leabrand Ltd in line with section 54(1) of the Modern Slavery Act 2015. The statement provides background to our organisation and our supply chain. It also sets out the steps the company will take during the financial year ending 31st August 2025

Our Business

Leabrand is a leading specialist in providing skilled, reliable workers and delivering first class projects to the construction and rail industry.

Our Supply Chains and risk management

As a labour only provider our supply chain is quite narrow. Mostly consisting of office supplies and PPE (personal protective equipment). While Leabrand understands that its supply chain is low risk it is aware that modern slavery risks will vary according to both country, sector and product and acknowledges the need to mitigate any risk of modern slavery within its supply chain.

Due Diligence Processes for Slavery and Human Trafficking

The company understands that it is impractical to audit and monitor suppliers and their supply chain in their entirety. However, it should be possible to identify key vulnerabilities and take a risk-based approach to ethical procurement. As part of the company's due diligence process regarding slavery and human trafficking the company's supplier approval procedure will incorporate a review of the controls to manage its supplier chain including traceability of raw materials or purchased items in line with its slavery and human trafficking policies and procedures.

Written correspondence is requested and supplied in the form of the company's supplier questionnaire detailing the systems, procedures and policies in place to combat slavery in their own supply chains.

Our Policies on Slavery and Human Trafficking

The company operates policies and procedures which reflect our commitment to providing safe and healthy work environment for our workforce, customers, stakeholders, suppliers and interested parties. Whilst complying with all legal requirements, codes of practice and all other requirements applicable to our activities.

The company director and senior management will take responsibility for implementing policies and procedures and provide the required resources and investment to ensure that slavery or human trafficking is not taking place within the company or its supply chain.

The policies and Procedures that set out our commitment to ethical business practices and slavery and human trafficking are:

- **Modern Slavery and Human Trafficking Policy**

Leabrand Ltd strictly prohibits the use of slavery and human trafficking of any form in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards

- **Harassment Policy**

We operate a policy specifically dealing with harassment of any kind (including racial, cultural, disability and sexual harassment) in the workplace. Such conduct or behavior is not permitted or condoned and all employees have a right to complain about harassment should it occur.

- **Whistleblowing policy**

Leabrand Ltd is committed to operating according to the highest standards of transparency, integrity and accountability across all business lines and contracts. This policy enables Leabrand Ltd employees, our associates to raise any serious concerns they may have about inappropriate activity without fear of reprisal.

- **Business Ethics Policy**

It is our goal to maintain the highest standards of ethics, professionalism and business conduct as well as ensure that we act in strict compliance with the law at all times. We will not tolerate any behaviour or practice that compromises the Company's integrity or honesty. All decisions will be fair and based on transparent processes.



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- **Supply Chain Management policy**
Our supply chain strategy is designed to encourage openness, trust and collaboration and we have created a set of relationship guidelines to ensure that these aspirations underpin the way in which we work with our supply chain
- **Equality, Diversity and Inclusion Policy**
The purpose of this policy is to provide diversity, inclusion and equality to all in employment, irrespective of their gender, race, ethnic origin, disability, age, nationality, national origin, sexuality, religion or belief, marital status and social class. We oppose all forms of unlawful and unfair discrimination.
- **Anti Bribery and Corruption Policy**
It is Leabrand Ltd Policy to comply with all laws, rules, and regulations governing anti bribery and corruption law, in all areas where we operate. Leabrand Ltd has a zero-tolerance approach to acts of Bribery and Corruption
- **Health and Safety Policy**
It is the policy of the company to ensure commitment to provide safe and healthy working conditions for the prevention of work related injury and ill health which satisfies the requirements of all of our customers, stakeholders and interested parties whenever possible and is specific to our OH&S risks and OH&S opportunities.
- **Procurement Supplier Evaluation Procedure**
The purpose of this procedure is to define the process of Purchase Orders, and the selection and evaluation of suitable suppliers.
- **Workforce Involvement procedure**
The purpose of this Procedure is to define the involvement of persons engaged on company projects. Their decision-making process, particularly in relation to a person's individual health, safety and welfare.

Supplier Adherence to our Values and Ethics

Should the company find that other individuals or organisations working on its behalf have breached this policy the company will take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships and contacting the authorities.

Training

The company endeavours to ensure adequate information and training is provided to its workforce, customers, stakeholders, suppliers and interested parties.

All employees attend a formal induction process which includes training in our policies and procedures. Managers are provided with a range of training including regular updates in matters pertaining to recruitment, remuneration and employee wellbeing.

Goals and Key Performance Indicators (KPIs)

- Review procurement process and procedures to ensure appropriate engagement with our supply chain in identifying and addressing the potential risk of modern slavery and human trafficking in our supply chain.
- Continue to raise awareness of potential risk of modern slavery and human trafficking with all its employees and stakeholders
- Continue to enhance our employee awareness with respect to modern slavery and human trafficking

S Cheema (director)