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UDC/P-003
Modern Slavery Policy

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Amendment Details

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1.0 Purpose

Urban Design & Construct Ltd (UDC) recognises that modern slavery, including forced labour and human trafficking, is a significant and growing global issue. As a Principal Contractor operating in the UK construction industry, we are committed to taking proactive, appropriate, and proportionate steps to ensure that slavery and human trafficking have no place within our business or supply chain.

This policy outlines our approach to identifying and mitigating the risk of modern slavery in all areas of our operations, including direct employment, agency workers, subcontractors, and material suppliers.

This policy is fully supported by the Managing Director and senior leadership team, who are committed to its effective implementation and continuous improvement.

Important Note: UDC is not considered a relevant commercial organisation as defined by Section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act"), because our annual turnover is below the threshold of £36 million. As such, we are not legally required to publish an annual modern slavery and human trafficking statement. However, we have voluntarily adopted this policy and associated practices to demonstrate our ethical commitment and to align with industry best practices.

2.0 Scope

This policy applies to all UDC employees, agency workers, subcontractors, suppliers, and any other third parties engaged to work on our behalf. It covers all aspects of our business operations and project delivery activities across the UK.

This policy forms part of UDC's broader commitment to ethical conduct, safeguarding, and sustainable business practices. It should be read in conjunction with the following related company policies:

- Safeguarding Policy
- Whistleblowing Policy
- Sustainable Procurement Policy

3.0 Policy Statement

UDC is committed to:

- Acting ethically and with integrity in all business dealings.
- Preventing modern slavery, forced labour, and human trafficking from taking place within our organisation or supply chain.
- Promoting transparency, awareness, and accountability on this issue.
- Continually improving our systems and procedures to identify and manage modern slavery risks.

We maintain a zero-tolerance approach to modern slavery and expect the same commitment from our supply chain partners. Compliance with this policy is a contractual requirement. Breaches may result in termination of contract and notification to relevant authorities.

4.0 Risk Areas and Mitigation Measures

We recognise that modern slavery risks are more prevalent in certain parts of the construction industry, particularly within labour supply chains and global material sourcing. The key areas where we have identified potential risk include:

Employees

- All employees are subject to rigorous right-to-work checks upon joining UDC.
- Terms and conditions of employment, including hours, pay, and leave entitlements, are clearly communicated and provided in writing.
- No fees or deductions are charged for employment opportunities.

Agency Workers

- UDC only engages agency workers through approved suppliers on our Preferred Supplier List.
- All agencies must verify the right to work for their operatives, confirm no work-finding fees are charged, and implement controls to prevent forced or bonded labour.
- We require suppliers to provide written confirmation of their anti-slavery policies and procedures.

Subcontractors

- Subcontractors must confirm that all operatives working on UDC sites have the legal right to work in the UK.
- We assess subcontractor approaches to employment rights and ethical practices as part of our prequalification process.
- We expect subcontractors to take responsibility for assessing modern slavery risks within their own supply chains, especially where materials or labour are sourced from high-risk regions.

Suppliers

- UDC primarily procures materials from UK-based suppliers that are subject to UK labour laws.
- Where materials are sourced from outside the UK, modern slavery risks are considered during the procurement decision-making process.
- Suppliers are expected to demonstrate compliance with the Modern Slavery Act 2015 and provide evidence of ethical sourcing policies where relevant.

5.0 Due Diligence

UDC undertakes risk-based due diligence to assess and monitor modern slavery risks. This includes:

- Reviewing supplier anti-slavery policies.
- Including ethical sourcing questions in prequalification processes.
- Conducting periodic audits or reviews.
- Requiring subcontractors to confirm policies and procedures.

6.0 Training and Awareness

We raise awareness among our staff and project teams on the signs and risks of modern slavery through site inductions, toolbox talks, and internal communications. Key staff involved in recruitment, procurement, and project management receive further guidance to ensure due diligence is embedded in our everyday processes.

- All new staff are introduced to modern slavery risks via site inductions and toolbox talks.
- Project managers, procurement staff, and supervisors complete annual refresher training.
- Regular communication on good practice is shared through internal updates.

7.0 Whistleblowing and Reporting Concerns

UDC encourages anyone who suspects modern slavery or unethical labour practices to report their concerns without fear of retaliation. Our Whistleblowing Policy allows for confidential reporting by employees, subcontractors, and third parties.

All concerns raised will be treated seriously, investigated appropriately, and escalated where required.

8.0 Responsibilities

- **Senior Management**: Holds overall accountability for compliance with this policy and for ensuring appropriate governance and oversight.
- **Human Resources**: Maintains and updates this policy, oversees employee vetting, and ensures compliance with employment standards.
- **Procurement & Commercial Team**: Ensures that subcontractors and suppliers are vetted appropriately and that modern slavery risks are considered during selection.
- **Project Managers & Site Managers**: Monitor subcontractor compliance on site and escalate any concerns relating to labour exploitation.
- **Approved Labour Suppliers**: Required to demonstrate robust processes for verifying worker eligibility, preventing exploitation, and ensuring fair treatment.

9.0 Review

This policy is reviewed every 3 years, or earlier if required by changes in legislation, company operations, or external risk factors. Updates are communicated to relevant employees and supply chain partners.

- This policy is reviewed every 3 years or earlier if required.
- Compliance is monitored through internal audits and supplier reviews.
- Results are reviewed annually by the senior management team.

10.0 Legislation

Modern Slavery Act 2015