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Modern Slavery & Human Trafficking Statement

Introduction

This statement sets out Enigma Industrial Services Limited actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2026 to 31 December 2026.

In previous years, our organisation has published its statement no later than 31st January. We recognise that we are publishing this statement later than expected. This is because of increased difficulty in gathering the required information from our suppliers.

As part of the construction sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Our organisation is absolutely committed to preventing slavery and human trafficking in its activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Enigma Industrial Services Limited:

This statement should be read in conjunction with our Human Rights policy, business practices policy and with the policies and the supplier codes of conduct of our company which state our position on human rights and the ethical standards we set for our own business activities and expect of our supply chain.

Countries of operation and supply

We currently only operate in England, Scotland, and Wales:

The main Modern Slavery risk within our operations stems from bringing workers employed by other companies onto our own or our customers' sites, particularly agency workers. There are also potential risks in our supply chain in relation to goods and services. Our suppliers and subcontractors are required to comply with our business practices and ethical supply policies and our site induction processes extend to subcontractor's workers operating on our sites. We also focus on embedding awareness of ethical risks, such as Modern Slavery, and engaging in discussion with our key suppliers on the steps they are taking in our supplier engagement meetings.

For our UK business the substantial majority of their transactions are with other UK-based organisations which are themselves subject to the Modern Slavery Act.

Government operated payment schemes where available. Employees' passports are not held as a matter of course but can be stored on their behalf in a secure environment upon request.

We are undertaking activities across our own business and with our supply chain to raise awareness of Modern Slavery. Appropriate training will be provided to those who are responsible for bringing agency workers and subcontractors on to site, and for relevant procurement staff.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** Our Human Resources Director (Geoff Hughes) is responsible for putting in place and reviewing policies and the process by which they were developed.
- **Investigations/due diligence:** The Board of Directors of Enigma Industrial Services Ltd are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking, their role would be to investigate instances of illegal trafficking and slavery and report those findings to the Managing Director and Human Resources Director.
- **Training:** Anyone who has a hiring or buying activity will be trained to understand the laws surrounding modern slavery and human trafficking, what to look for, how to audit the supply chain and how to report instances either reported or found through to our HR Director.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing policy:** We encourage all our workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns can complete our confidential disclosure form.
- **Employee code of conduct:** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct:** We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship. This process is managed by our Director of Business Services.
- **Recruitment/Agency workers policy:** We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. All our agency partners are audited for their own recruitment policies and processes.

Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier.
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- conducting supplier audits or assessments through our own staff, which have a greater degree of focus on slavery and human trafficking.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Training

We require all staff within our organisation to complete training on modern slavery as a module within our wider human rights training programme.

Our modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation.
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative.
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Board member approval:

This statement was approved by our board of directors, who review it once drafted by the HR Director has been approved on behalf of the board of directors by:

Signed by	Mr. Scott Hardie
Signature	
Position	Managing Director
Date	July 1 st 2026