

Modern Slavery Act 2015 Policy (2026)

Registered Office: 28 Bridge Street, Bury, BL9 6HH

Company Registration No. 05043833

Policy Owner: Ross Drennan, Director

1. Policy Statement

KDB Services Ltd maintains a zero-tolerance approach to modern slavery, human trafficking, forced labour, servitude, and all forms of exploitation.

This policy updates and strengthens our 2025 commitments, where we affirmed our ethical stance and requirement for integrity across our supply chain.

Modern slavery is a violation of human rights, and we are committed to ensuring it has no place in our operations or within the organisations we work with.

2. Scope

This policy applies to:

- All employees at every level
- Directors and officers
- Agency staff and subcontractors
- Labour-only workers
- Consultants, suppliers, and third-party partners
- Any individual acting on behalf of KDB Services Ltd

This mirrors the wide applicability set out in our previous 2025 policy.

3. Our Commitment

We commit to:

3.1 Ethical Business Practices

- Act with integrity in all business dealings.
- Prevent modern slavery within all operational activities and supply chains.
- This reflects our dedication shown in the 2025 Modern Slavery Statement.

3.2 Risk Identification & Prevention

- Conduct regular assessments of suppliers and subcontractors.
- Implement due diligence before onboarding any new supplier
- Review supply chain documentation and verify compliance with the Modern Slavery Act 2015.

3.3 Supplier Controls

All suppliers must:

- Demonstrate compliance with anti-slavery legislation
- Hold, provide or implement their own modern slavery policies
- Agree to contractual clauses requiring full compliance

3.4 Worker Rights and Ethical Labour Standards

- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association and collective bargaining
- Prohibition of violence, harassment, intimidation, or coercion
- Prohibition of worker-paid recruitment fees
- Prohibition of compulsory overtime
- Prohibition of child labour
- Prohibition of discrimination
- Prohibition of confiscation of identification documents

In addition, KDB Services Ltd ensures access to reporting mechanisms and provides access to remedy, compensation, and justice for victims of modern slavery.

This aligns with the obligations required in our 2026-27 statement and supplier agreements.

4. Responsibilities

4.1 Board of Directors

The board has overall accountability for ensuring that this policy is effectively implemented, as previously stated in the 2025 policy.

4.2 Compliance Manager

Responsible for:

- Day-to-day implementation
- Auditing control systems
- Ensuring appropriate training
- Responding to any policy-related queries

This maintains the role outlined in earlier versions.

4.3 Managers

Managers must:

- Ensure staff understand and follow the policy
- Identify risks of exploitation
- Monitor subcontractor behaviours

4.4 Employees

Employees must:

- Report any concerns immediately
 - Avoid any action that could enable unlawful practices
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5. Training & Awareness

We will:

- Provide annual training for procurement, contract management, site supervisors, and all client-facing roles
- Educate employees on identifying signs of exploitation
- Reinforce awareness across all operational teams

Employee training is a key feature of your 2025 statements and remains critical.

6. Reporting Concerns & Whistleblowing

KDB Services Ltd encourages the reporting of ANY suspicion of modern slavery.

- A confidential reporting mechanism is available
- Reports will be investigated promptly and without retaliation
- Whistleblowers will be protected, as outlined in last year's policy and statements

7. Continuous Improvement

We commit to:

- Ongoing enhancement of due-diligence processes
- Regular audits of supply chains, training programmes, and controls
- Annual review of this policy to ensure alignment with legislation and best practice

This follows the governance commitments in our 2025 statement.


8. Compliance with Legislation

This policy supports and is aligned with:

- Modern Slavery Act 2015
- UK employment law
- International human rights standards

KDB Services Ltd understands its obligations under Section 54 of the Modern Slavery Act 2015 and issues this policy as part of its 2026 compliance commitment, evolving from the 2025 statement.

Approved by;

Name:	Ross Drennan
Position:	Director
Signature:	
Date:	01/03/26