

Modern Slavery and Human Trafficking Statement

Modern slavery includes slavery, servitude, forced or compulsory labour, and human trafficking. Poluma Group Limited will not tolerate modern slavery or human trafficking in its business or supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and describes the steps Poluma Group Limited has taken during the financial year ending 31st January 2026 to help prevent modern slavery and human trafficking in its business and supply chains.

1. Organisation and supply chains

Poluma Group Limited is a multidisciplinary design, engineering, fabrication and project management business operating in the United Kingdom. It supplies engineering services and project delivery support to customers across the UK, including in sectors such as food and beverage, chemical, pharmaceutical, renewables and FMCG.

The Company purchases goods and services from third parties to support its operations. Direct suppliers are primarily UK-based, although some goods or services may involve overseas sourcing through suppliers' own supply chains.

2. Policies and governance

The Company's approach is supported by policies and controls designed to promote ethical conduct and compliance with applicable law. Relevant documents include a Code of Conduct (or equivalent), a whistleblowing/speak-up procedure, recruitment and employment processes, and supplier contractual terms or onboarding requirements addressing legal compliance and labour standards.

Responsibility for this statement sits with the Board of Directors (or equivalent governing body), which reviews and approves the statement for publication.

3. Risk assessment

Modern slavery risks are assessed using a risk-based approach that considers, where relevant, the nature of the goods or services purchased, labour intensity, the use of subcontracting, and the geographic footprint of supply and delivery.

4. Due diligence and response

Supplier engagement and due diligence are proportionate to the risk and the nature of the relationship. Depending on the engagement, this may include supplier onboarding checks, contractual protections (including termination rights for material non-compliance), and requesting policies, statements or assurances where risk warrants it.

Where concerns are identified, the Company responds on a case-by-case basis, which may include seeking corrective action, escalating through contractual or reporting channels, and reassessing the supplier relationship.

5. Training and awareness

Employees in relevant roles (for example procurement, supplier management, recruitment and operations) receive information or guidance on indicators of labour exploitation and how to raise concerns.

6. Effectiveness

The Company monitors the effectiveness of its approach in a proportionate manner. This may include reviewing concerns raised through reporting channels, supplier issues identified, and whether existing controls remain suitable for the Company's business and supply chain profile.

7. Approval and signature

This statement was approved by the Board of Directors of Poluma Group Limited on 15th January 2026 and signed on its behalf by:

Name: Carrie Pickerden

Title: Director

Signature: 

Date: 16/1/26

Where the Company has a website, this statement is published on that website and is accessible via a prominent link on the homepage, in accordance with section 54(7) of the Modern Slavery Act 2015.