



Modern Slavery and Human Trafficking Statement

Financial Year Ending: 2025

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015.

DSD Construction Ltd recognises that the construction and infrastructure sector presents inherent supply chain and labour risks. We operate a zero-tolerance approach to slavery, servitude, forced labour and human trafficking and embed proportionate, risk-based controls throughout our business and supply chain to mitigate those risks.

Modern slavery governance is overseen at Director level and forms part of our wider ESG and ethical compliance framework. (Please see Appendix A)

Our Structure, Business and Supply Chains

DSD Construction Ltd is a UK-based civil engineering and infrastructure contractor delivering highway, infrastructure, in-situ recycling and regulated sector works across the United Kingdom.

The Company operates under a defined governance structure led by the Board of Directors. Day-to-day operational leadership is delivered by the Managing Director, supported by functional leads across Operations, Commercial, Procurement and Health, Safety & Compliance.

Our core delivery model comprises a directly employed workforce supported by a structured and pre-qualified supply chain.

Our supply chain includes:

- Construction materials suppliers (aggregates, bituminous products, hydraulic binders)
- Plant and equipment hire providers
- Labour-only subcontractors
- Specialist engineering subcontractors
- Logistics and fuel providers

Supply chain partners are integral to project delivery and are subject to defined onboarding, contractual and compliance controls.

The majority of our suppliers operate within the UK. Where international sourcing occurs, enhanced scrutiny and supplier assurance measures are applied.

Governance and Functional Responsibilities

Modern slavery compliance is embedded within DSD Construction Ltd's corporate governance framework.



Board of Directors

- Provide overall strategic oversight.
- Approve and annually review the Modern Slavery Statement.
- Maintain accountability for ethical governance.

Managing Director

- Holds executive responsibility for implementation of modern slavery controls.
- Oversees compliance across operations and supply chain.
- Acts as escalation point for serious concerns.

Commercial & Procurement Function

- Conduct supply chain onboarding and pre-engagement vetting.
- Embed modern slavery compliance clauses within subcontract agreements.
- Monitor labour-only subcontracting arrangements.

Operations & Site Management

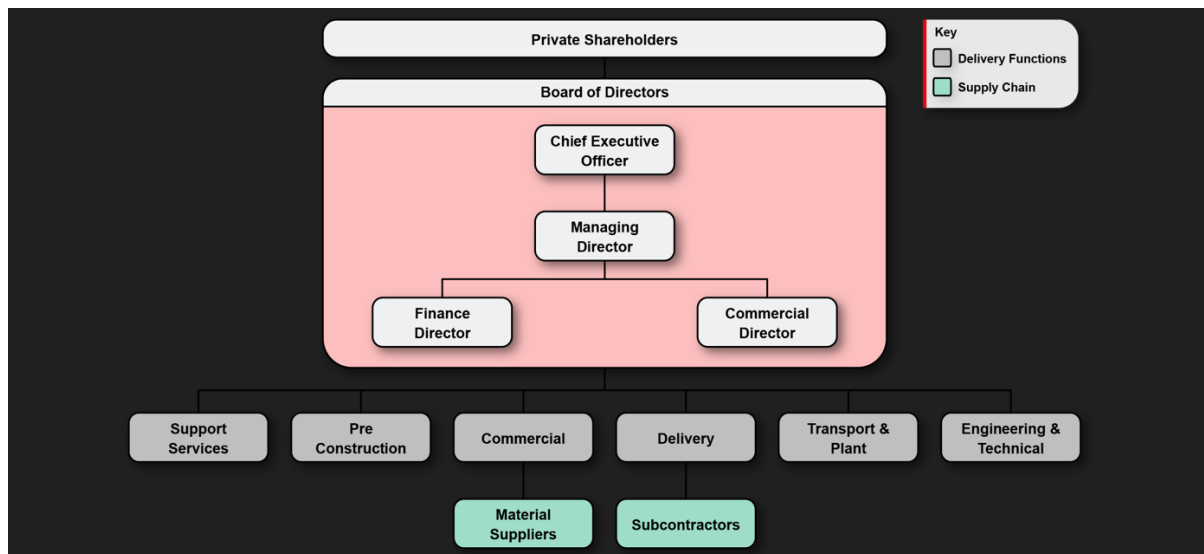
- Maintain visibility of workforce practices on site.
- Identify and escalate any indicators of exploitation or unlawful working.
- Ensure compliance with right-to-work verification processes.

HR & Compliance Support

- Maintain employment documentation.
- Conduct right-to-work checks and ongoing monitoring.
- Deliver induction and awareness briefings.

This functional allocation ensures that modern slavery risk is managed at both governance and operational levels.

Fig (a)



Policies in Relation to Slavery and Human Trafficking

DSD Construction Ltd maintains a formal governance framework supporting ethical labour standards, including:

- Anti-Slavery and Human Trafficking Policy
- Code of Business Conduct
- Ethical Procurement Policy
- Whistleblowing Policy
- Recruitment and Right-to-Work Procedure
- Equality, Diversity and Inclusion Policy

These policies establish clear expectations for employees, subcontractors and suppliers and are embedded through contractual obligations and supplier onboarding processes.

Compliance with the Modern Slavery Act 2015 is a mandatory condition of engagement within our supply chain.

Due Diligence Processes

We apply a structured, risk-based due diligence process proportionate to the infrastructure sector, including:

- Pre-qualification and financial vetting of subcontractors
- Verification of Companies House registration and trading history
- Right-to-work verification for all directly employed staff



- Flow-down contractual clauses requiring compliance with anti-slavery legislation
- Monitoring of labour-only subcontracting arrangements
- Supplier compliance declarations and confirmation statements

Higher-risk categories (including labour-only subcontracting and lower-tier supply chains) are subject to enhanced scrutiny.

Risk Areas and Mitigation Measures

We recognise that modern slavery risk within infrastructure delivery can arise in:

- Labour-only subcontracting models
- Agency and temporary workforce supply
- Lower-tier subcontracting
- International material sourcing

DSD Construction Ltd mitigates these risks through:

- Preference for long-standing, vetted supply chain partners
- Clear prohibition of cash payment labour practices
- Verification of right-to-work documentation
- Transparency requirements within subcontract arrangements
- Contractual audit rights where appropriate
- Clear reporting channels via whistleblowing procedures
- Director-level oversight of supply chain compliance

Risk exposure is reviewed annually and following any material change to our operational model.

Effectiveness and Performance Monitoring

DSD Construction Ltd measures the effectiveness of its modern slavery controls through defined governance and compliance indicators. These include:

Workforce Compliance

- 100% right-to-work verification for all directly employed staff prior to commencement of employment.
- 100% contractual employment documentation issued to directly employed staff.
- Monitoring of time-limited immigration permissions and revalidation prior to expiry.



Supply Chain Controls

- Modern slavery compliance clauses included in all subcontractor agreements.
- Pre-engagement vetting undertaken for all new subcontractors and key suppliers.
- Risk-based review of labour-only subcontracting arrangements.
- Confirmation of statutory wage compliance within supply chain engagements where applicable.

Training & Awareness

- Modern slavery policy briefing delivered as part of 100% of employee inductions.
- Periodic awareness briefings delivered to senior management and commercial teams.

Governance & Oversight

- Annual Board review and approval of the Modern Slavery Statement.
- Director-level oversight of reported concerns.
- Investigation and escalation procedures in place for any suspected breaches.

As of the date of this statement, DSD Construction Ltd has not identified any substantiated instances of modern slavery within its operations or direct supply chain.

We remain committed to continuous improvement and will refine our monitoring approach in line with evolving industry best practice.

Training and Capacity Building

Modern slavery awareness forms part of our compliance culture. Training is delivered proportionate to role and risk exposure, including:

- Director and senior management oversight
- Commercial and procurement team awareness
- Site management recognition of exploitation indicators
- Induction-level ethical standards briefings

Training includes:

- Identifying signs of forced labour
- Understanding supply chain risk indicators
- Reporting procedures
- Responsibilities under the Modern Slavery Act 2015



We continue to enhance awareness in line with industry best practice and National Highways expectations.

Governance and Approval

Responsibility for modern slavery compliance sits at Director level within DSD Construction Ltd. (Please see Appendix A). This statement has been reviewed and approved by the Board and will be reviewed annually.

Signed:

A handwritten signature in black ink, appearing to read 'Shaun Nugent', with a stylized flourish extending to the right.

Date: 01.02.26

Shaun Nugent - Chief Executive Officer



Appendix A

Modern Slavery Control Matrix

DSD Construction Ltd

This matrix summarises the governance, risk controls and monitoring mechanisms implemented by DSD Construction Ltd to prevent modern slavery and human trafficking within our operations and supply chain.

Risk Area	Identified Risk	Control Measures Implemented	Monitoring / Assurance	Responsible Owner
Labour-Only Subcontracting	Risk of exploitation, unlawful employment practices	Pre-qualification checks; contractual compliance clauses; prohibition of cash payments; verification of right-to-work; preference for established subcontractors	Periodic review of subcontractor arrangements; site-level oversight	Director / Commercial Lead
Agency & Temporary Labour	Risk of coerced labour or undocumented workers	Approved supplier onboarding; right-to-work verification; supplier declarations	Compliance review during supplier onboarding; management oversight	Commercial Team
Lower-Tier Supply Chain	Reduced visibility beyond Tier 1 suppliers	Flow-down contractual obligations; supplier declarations; risk-based scrutiny of key packages	Annual supply chain compliance review	Director
International Material Sourcing	Risk of unethical labour standards in source countries	Preference for UK-based suppliers; supplier compliance confirmations; ethical procurement requirements	Review of high-risk material sources during procurement	Procurement Lead
Direct Employment	Risk of unlawful working arrangements	100% right-to-work verification; transparent payroll; formal contracts of employment	HR record checks; payroll controls	Director
Site Operations	Risk indicators not recognised at site level	Management awareness training; whistleblowing	Site management oversight; incident reporting process	Operations Manager



Risk Area	Identified Risk	Control Measures Implemented	Monitoring / Assurance	Responsible Owner
		policy accessible to workforce		
Reporting & Escalation	Concerns not raised or investigated	Formal whistleblowing procedure; clear reporting routes; non-retaliation commitment	Director-level review of any reported concerns	Director
Governance & Oversight	Insufficient senior accountability	Board approval of statement; annual review; ESG integration	Annual Board review	Board of Directors