

Modern Slavery Act 2015 - Compliance

To: All Directors and Staff of Deeley Group Limited

From: Peter Deeley, Joint Managing Director, Deeley Group
Eleanor Deeley, Joint Managing Director, Deeley Group

Date: 1 January 2024

Ref: **Modern Slavery Act 2015**

The Modern Slavery Act came into force on 26 March 2015.

An Act to make provision about slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims; to make provision for an Independent Anti-slavery Commissioner; and for connected purposes.

These regulations require commercial organisations with a total turnover of at least £36 million to publish a slavery and human trafficking statement under section 54 of the Modern Slavery Act 2015 ("the 2015 Act").

Deeley Group Limited is fully committed to driving out the possibility of Slavery and Human Trafficking taking place in any of its Construction and Development activities undertaken by ourselves and our supply chain across the United Kingdom.

We have provided 7 principles to consider, namely:

Principle 1 - Proportionate procedures

The Deeley Group Employee Handbook – Section Two Contractual Conditions sets out the Rules of Conduct we expect from all staff and directors. In relation to The Modern Slavery Act 2015 we detail below our procedures:

- We will afford our employees the freedom to choose to work for them. Employees should be free to leave their employer after reasonable notice is served.
- We will demonstrate a commitment to equality of opportunity for individuals and groups enabling them to live their lives free from discrimination and oppression;
- We will offer working hours to their staff which are compliant with national laws or industry standards;
- We will under no circumstances abuse or intimidate employees and have appropriate disciplinary, grievance and appeal procedures in place;
- We will work within the laws of our country;

- We will take appropriate measures to ensure the health and safety of their workforce and the wider public;
- We will offer wages and benefits that at the very least meet relevant industry benchmarks or national legal standards.

Principle 2 – Understanding the indicators of forced labour

Forced labour is a form of modern slavery, and one of the worst forms of human exploitation in supply chains. It can also be incredibly difficult to identify and find evidence for. To learn more about the indicators of forced labour and why organisations use them to understand forced labour risks we use Sedex, one of the world's leading ethical trade membership for guidance. They list the following indicators of forced labour:

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

More information on these indicators can be found at: <https://www.sedex.com/understanding-the-indicators-of-forced-labour/>

Principle 3 - Top Level Commitment

The Directors of Deeley Group Limited are totally committed to preventing slavery and human trafficking by persons associated with it and we will continue to foster a culture in which slavery or human trafficking is never acceptable.

The Employee Handbook and the above procedure clearly set out how we wish to deal with Modern Slavery Act 2015. Contravention of the Rules of Conduct may be treated as misconduct and dealt with through the disciplinary procedures. You should consult a Director about any circumstances which you believe could be regarded as inconsistent with our procedures.

Principle 4 - Risk Assessment

The Directors of Deeley Group Limited will take into account the extent of the organisation's exposure to potential and external risks slavery and human trafficking on its behalf by people associated with it. This assessment will be reviewed and discussed at Deeley Group Board Meetings every six months or as deemed appropriate to assess any changes to markets etc and will be both informed and documented.

Principle 5 - Due Diligence in the Supply Chain

Due diligence procedure (via a proportionate and risk based approach) will be applied in respect of persons who do or will perform services for or on behalf of Deeley Group Limited, so as to mitigate slavery and human trafficking. We will apply the following procedures:

- We actively communicate with all of our supply chain on the requirements of the Modern Slavery Act.
- We require all new and existing members of our supply chain to comply with the Modern Slavery Act.
- If a supply chain member does not comply or is convicted of any offence in relation to this activity then they will be removed from our supply chain.

Principle 6 - Communication

By virtue of this memorandum and the Employee Handbook, we have communicated our policies and procedures to our directors and staff. Any changes in policy and procedures will be documented in a similar manner.

In July 2021 our front-line staff (site and contract managers) and procurement team (surveyors and accountants) who liaise regularly with the supply chain undertook 'Preventing Illegal Working' awareness training.

Principle 7 - Monitoring and Review

The Directors of Deeley Group Limited, will every six months monitor and review the above procedures and any improvements and changes will be made where necessary.

Deeley Group Limited prides itself on its integrity and we know that we have a team working for us that uphold the highest standards and we do not deem it necessary to have too detailed or extensive specific extra procedures. In order to ensure compliance with the law and as Deeley Group Limited agrees with the principles of the legislation, the aforementioned policies and procedures are deemed appropriate to implement going forward.

If you have any queries, please do not hesitate to contact a director.

Peter Deeley, Joint Managing Director, Deeley Group

Signature

Eleanor Deeley, Joint Managing Director, Deeley Group

Signature



Date: 1st January 2024

Review Date: 31st December 2024