

Document Reference: UHRP030	Title: ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT & POLICY	
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INTRODUCTION

We are committed to improving our practices to combat slavery and human trafficking within any part of our supply chain.

All our directors and employees are required to act whenever any concerns are raised whether from within or from outside of the business.

We rely on an extensive contractor network, and we will regularly communicate and interact with them to ensure that there is no modern slavery in their own business and supply chains.

ORGANISATION'S STRUCTURE

We are a construction company based in the UK only. We operate from our head office in Bristol and regional office in Derby. We are a Management Contractor who uses a large network of approved contractors to help us delivery schemes across the whole of the country.

SCOPE

This policy applies to all individuals who work for, or on behalf of, Uplands, including (but not limited to):

- Employees (e.g., full-time, part-time, temporary or contract)
- Contractors
- Board members
- Third party members (e.g., vendors, suppliers, partners, clients)

This policy covers all operations and business relationships, including on-site projects, employment practices, supplier contracts and supply chains.

GOVERNANCE

The HR Department is responsible for implementation of the following policies, including maintaining, reviewing and updating the policy to ensure relevance and compliance with current laws, regulations and organisational values.

Individuals engaged in procurement or supply chain activity are responsible for conducting due diligence on new and existing suppliers, monitoring compliance and escalating any identified risks or violations to available channels.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We will endeavour to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

OUR SUPPLY CHAINS

Our supply chain comprises the engagement of subcontractor organisations to carry out works and services on our construction sites and the sourcing of materials and manufactured products.

We implement a number of processes to ensure, where practicable, that our supply chain adheres to our expectations in respect of their workforce. We utilise SSIP schemes, alongside amending our own pre-qualification process to support this process.

We look to build long term relationships with our suppliers and subcontractors and make clear expectations of their business behaviour.

We encourage the reporting of concerns and the protection of whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking, and we expect all those in our supply chain and contractors to comply with our values.

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DUE DILIGENCE

Where possible, we build long standing relationships with our suppliers and customers and make clear our expectations of business behavior.

Communicate during site inductions and provide literature in site cabins highlighting the issues surrounding Modern Slavery and providing contact numbers for support agencies.

GRIEVANCE MECHANISMS

If you suspect any instances of forced labour, child labour or human tracking, you should raise a grievance by making a written complaint, stating that it is being made under this procedure. All reports should be made to your direct manager. You should describe the concern as clearly as possible, including:

- any facts or observations;
- names of involved parties (if known);
- date, time and location;
- names of possible witnesses;
- any immediate risks to safety; and
- evidence available (if any).

You do not need proof to file a grievance. Any reasonable suspicion is enough to file a report.

All reports will be acknowledged within 48 hours. Uplands is committed to ensuring all risks, harm and/or danger are mitigated immediately.

This procedure will be made accessible and communicated to all employees via Uplink.

CONFIDENTIALITY

All information disclosed during the grievance process will be handled with the highest degree of discretion. Only personnel directly involved in the process of receiving, investigating or resolving a grievance will have access to related information, records and communication.

While Uplands strives towards full confidentiality, there may be instances when safety issues or legal obligations require disclosure. In these cases, we will limit the sharing of information to the minimum necessary to address the matter appropriately.

NON-RETALIATION

Uplands prohibits any form of retaliation against individuals who report grievances, participate in an investigation or raise concerns in good faith. Retaliation is defined as adverse action, threat, intimidation, discrimination or negative treatment that occurs because an individual sought to use the grievance mechanism.

Any alleged retaliation will be treated as a serious violation of company policy and may result in disciplinary measures, up to and including termination of employment.

REMEDIATION PROCESS

We commit to providing a timely, fair and effective remediation, if a violation of the Company's policies is substantiated. This includes restoring a safe and respectful work environment for all affected parties and preventing future incidents.

All actions will be tailored to the severity of the violation, consistent with any relevant laws and regulations, and implemented with respect for confidentiality and the wellbeing of all affected parties.

Actions may include, but are not limited to:

- release of workers from coercive or abusive conditions,
- providing access to legal assistance and victim services,
- support safe return to education (where applicable), and
- termination of supplier relationship.

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TRANSPARENCY

Uplands will communicate the progress and outcome to all relevant stakeholders in a clear and timely manner, while protecting all confidential and legally sensitive information. Relevant stakeholders will be informed of any actions affecting them, and management or other relevant parties will receive the information required to implement remedies and uphold accountability.

MONITORING EFFECTIVENESS

Uplands will monitor the effectiveness of remedial actions for at least ninety (90) days following resolution. HR will conduct periodic check-ins and review any new information. The Company may adjust the remedies, where additional support or corrective action may be required.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of our staff. All directors have been briefed on this subject.

During the annual site manager refresh training there will be a section on Modern Slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the current financial year.

MONITORING PROGRESS

To uphold our commitment to improving our practices to combat slavery and human trafficking across our supply chain, we will:

- Train 100% of employees engaged in procurement activities on slavery and human trafficking awareness by 2028.
- Audit 5% of our suppliers every two (2) years to ensure compliance with our policies on slavery and human trafficking by 2030.

POLICY REVIEW

This statement will be reviewed annually by HR to ensure relevance and compliance with international laws, including the Modern Slavery Act 2015, International Labour Organisation (ILO) Conventions on Forced Labour, Universal Declaration of Human Rights and other relevant regulations.


Alastair Shiner

HR Director

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