
MODERN SLAVERY & HUMAN TRAFFICKING POLICY

1. Policy Statement

H-K-L Specialists Limited (the 'Company') enforces an uncompromising commitment to identifying, preventing, and driving out acts of modern slavery, servitude, forced or compulsory labour, and human trafficking from within our direct operations and across our entire supply chain. The Company acknowledges its statutory responsibilities under the Modern Slavery Act 2015 and demands absolute operational transparency from all internal teams, sub-contractors, and material vendors. The Company will not support, engage, or deal with any business or organization knowingly involved in the exploitation of adults or children.

2. Operational Definitions

Modern slavery represents a severe violation of fundamental human rights. It encompasses:

- **Slavery & Servitude:** Exercising ownership attributes over a person, or forcing them to provide services through coercion.
- **Forced or Compulsory Labour:** Restricting individual freedom or withholding statutory rights to extract work against free will.
- **Human Trafficking:** Arranging, facilitating, or harbouring individuals with the intent to exploit them for financial or commercial gain.

3. Procurement Controls & Risk Management

All personnel involved in the procurement of construction materials, cladding systems, specialist machinery, or external labour services must adhere to rigorous vetting rules:

- **Approved Supplier Log:** Verify that potential vendors pass compliance screening prior to any contract award or purchase order issue.
- **Risk Evaluations:** Evaluate procurement operations periodically to isolate high-risk supply lines, tracking material origins to counter hidden exploitation.
- **Behaviour Framework (SKEB):** Supply chain partners must guarantee that their workforce demonstrates professional, compliant, and respectful behaviour, ensuring site operatives are free from exploitation or unlawful wage retention.

4. Project-Level Risk Controls (Dual-Role Delivery Scope)

A. Operating as a Specialist Subcontractor

The corporate HR and payroll teams will ensure that all direct installers and agency labourers are paid in full compliance with the UK Living Wage baseline, and that right-to-work data remains fully verified. Any attempts by an external main contractor's logistics team to impose unethical working hours or restrict worker movements on-site must be immediately reported to our management line.

B. Operating as a Principal Contractor (PC)

The site management team will actively monitor the welfare conditions of all sub-contracted trades within our project boundaries. Spot-checks will be conducted on site inductions, CSCS cards, and payroll delivery confirmations. Any subcontractor found utilizing unverified labour or breaching the Modern Slavery Act 2015 will face immediate site expulsion and formal contract termination.



5. Reporting Obligations & Non-Retaliation

Any member of staff who suspects, identifies, or gains evidence of a modern slavery violation or a breach of the Modern Slavery Act 2015 must report the matter to the Managing Director without delay. The Company guarantees absolute protection, confidentiality, and immunity from career penalisation for any whistleblower who highlights a genuine human rights risk or refuses to cooperate with a non-compliant supply chain partner.

Custody and accountability for the execution, maintenance, and annual review of these corporate policies remain vested in the Managing Director.

NAME: Terry Damms

POSITION: Managing Director

SIGNED: _____



DATED: 13/08/26

