

MODERN SLAVERY POLICY STATEMENT

Glenman's Code of Conduct for precluding forced labour from our supply chain, pursuant to Section 54, Part 6 of the Modern Slavery Act 2015.

Our Business

Glenman is privately owned construction company working within London and the surrounding boroughs. We deliver new build and refurbishment projects for our clients across various sectors including education, residential, public, healthcare and commercial in both the private and public sector.

Due Diligence

All our directly employed staff and external supply chain are required to understand our commitment to control and eliminate (as far as possible) the risk of modern slavery and human trafficking from taking place anywhere in our business. This is delivered through various effective systems including:

- Inductions for new staff.
- A suite of related company policies issued to and acknowledged by all.
- A vigorous vetting procedure for our supply chain (with contractual compliance).
- Posters displayed on-site highlighting the issues.
- Site audits for ongoing monitoring against KPIs.
- Regular and ongoing training provided for all staff and supply chain through the Supply Chain Sustainability School.

Forced or Involuntary Labour

Workers will not be subject to any form of forced, bonded, indentured or prison labour. All work must be voluntary and workers shall have the freedom to terminate their employment at any time without penalty, given notice of reasonable length.

Recruitment Fees

Workers will not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel, processing official documents and work visas both at home and in host countries.

Document Retention

Confiscating or withholding worker identity documents or other valuable work permits and travel documentation (e.g. passports) is strictly prohibited. The retention of personal documents will not be used as a means to bind workers to employment or to restrict their freedom of movement.

Contract of Employment

Written contracts of employment shall be provided to all workers in a language they understand, clearly indicating their rights and responsibilities with regards to wages, working hours and other working and employment conditions. All workers will be provided with their employment contract prior to deployment. The use of supplemental agreements and the practice of contract substitution (the replacement of an original contract or any of its provisions with those that are less favourable) is strictly prohibited.

Deposits

All workers will not be required to lodge deposits or security payments at any time.

Humane Treatment

The workplace will be free from any form of harsh or inhumane treatment. Disciplinary policies and procedures will be clearly defined and communicated to all workers.

Workplace Equality

All workers, irrespective of their nationality or legal status will be treated fairly. Migrant workers will benefit from conditions of work (including but not limited to wages, benefits and accommodations) no less favourable than those available to country nationals. Migrant workers (or their family members) will not be threatened with denunciation to authorities to coerce them into taking up or maintaining employment.

All workers will be paid the living wage appropriate to their area of location and will be provided with all legally mandated benefits. Wage payments will be made at regular intervals and directly to workers in accordance with national law and payment will not be delayed, deferred or withheld. Only deductions, advances and loans authorised by national law are allowed and if made or provided, the arrangements for repayment will be plainly discussed with the worker in advance to obtain their full consent and understanding.

Clear and transparent information will be provided to workers about hours worked, rates of pay, and the calculation of legal deductions. All workers will be given full and complete control over their earnings. Wage deductions will not be used as a disciplinary measure, or to keep the workers tied to their employer or to their jobs. Workers will not be held in debt bondage or be forced to work in order to pay off a debt.

Working Hours

Workers will not be forced to work in excess of the number of hours permitted in national law. All overtime will be voluntary. No worker will be made to work overtime under the threat of a penalty, dismissal or denunciation to authorities. Where the worker agrees to work outside their usual contracted hours due to the exigencies of the business, the worker can choose to take additional payment or time off in lieu.

Freedom of Movement and Personal Freedom

Workers freedom of movement will not be unreasonably restricted. Workers will not be physically confined to the workplace and will not experience any coercive means to restrict their freedom of movement and personal freedom.

Grievance Procedure

An effective grievance procedure is available to all workers ensuring that they can acting individually or with others, submit a grievance without suffering any prejudice or retaliation of any kind.

Monitoring and Reviewing Effectiveness

Regular reviews are conducted by our senior management team to ensure our policies and systems are working effectively including the outcome of any project KPIs.



Signed: Brendan Reynolds, Pre-Construction Director

Date: January 2025

Next Review: January 2026