

ANTI-SLAVERY POLICY

Policy Statement

Modern slavery is a crime and a violation of fundamental human rights.

It includes slavery, servitude, forced or compulsory labour, and human trafficking. All forms involve the exploitation of individuals for personal or commercial gain.

Gypcraft Drylining Contractors Limited ("Gypcraft") has a **zero-tolerance approach** to modern slavery and human trafficking. We are committed to acting ethically, with integrity, and with transparency in all business dealings. We will implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere within our business or supply chains.

This policy supports the **Modern Slavery Act 2015** and reflects our commitment to responsible business practices.

Purpose

This policy aims to:

- Prevent modern slavery and human trafficking within Gypcraft and its supply chain
- Ensure compliance with the Modern Slavery Act 2015
- Promote transparency and ethical conduct
- Provide clear expectations for employees, contractors, and suppliers
- Protect vulnerable individuals from exploitation

Scope

This policy applies to all individuals working for or on behalf of Gypcraft, including:

- Employees (permanent, temporary, agency)
- Contractors and subcontractors
- Labour-only subcontractors
- Consultants and agency workers
- Directors and officers
- Third-party representatives and business partners

Our Commitments

Gypcraft will:

- Conduct business in a manner that prevents modern slavery
- Maintain transparency in our operations and supply chains
- Implement due diligence processes for suppliers, subcontractors, and labour providers
- Include anti-slavery clauses in contracts
- Require suppliers to hold their own supply chains to the same standards
- Investigate any concerns promptly and take appropriate action

Identifying and Managing Risk

Gypcraft recognises that modern slavery risks are higher in:

- Labour-intensive industries
- Subcontracted workforces
- Multi-tier supply chains
- Overseas sourcing

To manage these risks, we will:

- Assess suppliers based on risk factors
- Require evidence of right-to-work checks
- Verify labour providers and recruitment practices
- Monitor working conditions on sites
- Ensure payment practices do not create vulnerability

Supplier and Contractor Expectations

All suppliers and contractors must:

- Comply with the Modern Slavery Act 2015
- Prohibit forced, compulsory, or trafficked labour
- Ensure workers are not charged recruitment fees
- Provide safe working conditions
- Maintain transparent employment practices
- Allow audits or inspections by Gypcraft

Failure to comply may result in:

- Suspension of work
- Contract termination
- Reporting to authorities

Reporting Concerns

Gypcraft encourages anyone with concerns about modern slavery to report them immediately.

Concerns may be raised with:

- Line Manager
- Head of SHEQ
- Managing Director
- Confidential reporting email: mark.adams@gypcraftltd.co.uk or francesca.mastinu@gypcraftltd.co.uk

Reports will be:

- Treated seriously
- Investigated promptly
- Handled sensitively and confidentially

No individual will suffer retaliation for raising a genuine concern.

Training & Awareness

Gypcraft will:

- Provide training at induction on recognising and reporting modern slavery
- Deliver refresher training annually
- Ensure managers understand their responsibilities
- Communicate this policy across all sites and platforms

Record-Keeping

We will maintain accurate records of:

- Supplier due diligence
- Right-to-work checks
- Training attendance
- Investigations and outcomes

Records will be retained in line with company data protection procedures.

Monitoring & Review

Gypcraft will:

- Review this policy annually
- Monitor supply-chain compliance
- Update procedures to reflect best practice and legal changes
- Report any identified risks or incidents to senior leadership

Responsibility for implementation and review rests with the Head of SHEQ, with oversight from the Managing Director.

Approved by



Mark Adams

Managing Director

Date 01/05/2026