



MODERN SLAVERY AND HUMAN TRAFFICKING POLICY PO-13

Opening Statement

P T Contractors Ltd has zero tolerance to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business, and we place the same expectation on our suppliers.

This Anti-Slavery Policy Statement is the principal articulation of policy on slavery and human trafficking. It is intended to inform and influence all the operational procedures within P T Contractors.

Our stated Anti-Slavery Policy Statement 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 (amongst our other priorities) that slavery and human trafficking is not taking place anywhere in our business or related supply chains.

Due diligence and implementation processes for slavery and human trafficking.

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies and procedures appropriate to the different departments within P T Contractors Ltd.

Structure and Supply Chains

P T Contractors is a Company within the Construction sector.

The Company employs 40 people in the UK. The following website provides more information regarding the nature of our work: <http://ptcontractors.co.uk/>

The nature of our Company requires that we work in conjunction with a range of suppliers.

The nature of our supply chain is primarily the supply of construction materials and products for the use in construction and civil engineering, or the supply of subcontracted labour, including specialist subcontractors. We foster collaborative long-term relationships with our supply chain and apply risk profiling of both suppliers and subcontractors after receiving a completed PQQ and desk top audit of their accreditations to ensure amongst many other aspects that neither are involved with modern slavery or human trafficking. To aid this process and ensure our supply chain remains compliant with all applicable regulation PTC operate and maintain an approved supplier/subcontractor database, which is monitored through regular evaluations provided by monitoring and measured against their performance as part of our health safety and quality controls and procedures. This process is audited against our ISO accreditations of ISO 45001:2018 and ISO 9001:2015 by an UKAS approved 3rd party.

Due Diligence Processes Relating to Slavery and Human Trafficking

As part of our efforts to monitor, manage and reduce the risk of slavery and human trafficking occurring within our Company or supply chains, we adopt the following due diligence procedures:

Our processes aim to:

- Identify, monitor and manage areas of potential risk in our Company and supply chains;



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- Scrutinise any identified areas of risk within our Company and supply chains;
- Adopt a zero-tolerance approach to slavery and human trafficking throughout the Company and our supply chains;
- Provide support and protection from detriment or disadvantage to any person who, in the public interest, raises genuine concerns amounting to a protected disclosure.

Risk and Compliance

The Company regularly evaluates the nature and extent to which both ourselves and our supply chains are exposed to the risk of modern slavery occurring. Our commitment to compliance is evident in that we hold and maintain ISO Standards 45001:2018, ISO 9001:2015, ISO 14001:2015. We also hold a SSIP through Acclaim (Constructionline) and Achilles UVDB Gold status.

We do understand and fully appreciate that construction is classified as being prevalent on the list of high risk sectors, however, we do not consider that we PTC operate in that part of the sector that is considered high risk, because we work mostly on small projects where numbers of workers are generally less than 25 including our own workers. Most subcontractors will be specialists in specific aspects of civil engineering or construction and well known to us through years of repeat business. Furthermore, we operate robust assessment and approval process, monitoring and conduct risk evaluation of our suppliers and subcontractors, maintaining their risk profile in an approval database for those involved in procuring services, materials or products for the projects we undertake.

Where we have identified a potential risk, we prioritise any risks and take appropriate action to put remedial measures in place. These include but not limited to: Direct communication with those identified as potential risk, Root cause Investigation carried out where applicable and share findings with the appropriate authorities should any noncompliance or incident be identified. Apply a revised risk profiles set against a suppliers or subcontractor where we have taken action, received poor evaluation from site, possibly resulting in terminating their contract and working relationship.

We ensure our suppliers are aware of our policies and encourage them to adopt our high standards. We adopt a zero-tolerance approach to slavery and human trafficking throughout the Company which extends to our supply chains. Upon discovery of a breach of our policies relating to slavery and human trafficking, we will terminate any relationship with the relevant supplier with immediate effect.

Success and Effectiveness of our Processes

By maintaining the below standards, the Company is able to measure how successful we have been in safeguarding against slavery and human trafficking in our business or supply chains:

- ISO Standards 45001:2018
- ISO 9001:2015
- Achilles UVDB
- SSIP(Acclaim)
- Safe PQQ Pas91
- Constructionline Gold level



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Training

We ensure all employees are aware of the risks of modern slavery and human trafficking in our business and supply chains. We run training programmes to enable our employees to identify and report any potential breaches of the Company's anti-slavery and human trafficking policies.

Further Actions, Approval and Endorsement

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in the Company or our supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- Maintain high vigilance on site and through the procurement processes
- Continue the evaluation and feedback process of identified suppliers/subcontractors by risk level
- Conduct investigations where risk or suspicion is raised
- Communicate approval risk rating back to suppliers/subcontractors
- Apply and use our influence downstream to encourage them to achieve accreditations such as ISO 45001/9001 or Safe PQQ/PAS91 to demonstrate 3rd party verification to compliance with Modern Slavery Act 2015
- Monitor IASC for latest information, seeking to apply best practice wherever possible.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for P T Contractors for 12 months from the date below.

Signed

A handwritten signature in black ink, appearing to read 'P. N. Trant', written over a horizontal line.

Date 03/01/2023

P.N. TRANT
Managing Director