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1. About this policy

1.1 This policy supports the Adler and Allan Group's annual Modern Slavery Statement published in accordance with section 54 of the Modern Slavery Act 2015 and applies to all employees, agency workers, contractors, suppliers and other business partners.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Company is committed to driving out modern day slavery within its own business and supply chains. The Adler and Allan Group is committed to ensuring that all of its business operations are free from involvement with slavery.

1.2 The Company is committed to:

a) ensuring that slavery is considered and addressed in our approach to corporate social responsibility.
b) ensuring that any concerns about slavery can be raised through our whistleblowing procedure.
c) carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK.
d) ensuring that all commercial agreements include an obligation on our customers, suppliers and sub-contractors to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act.

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e) identifying and addressing any areas of high risk in the Company and related operations.
f) providing training for all employees on issues relating to slavery.

2. Policy Statement

2.1 Human trafficking and slavery are crimes under UK and international law. These crimes exist in countries throughout the world. This policy statement thus defines the Company's commitment to ensuring that human trafficking and slavery does not exist within its own business, (and especially from within its supply chain).

2.2 The Human Resources team, Head of Procurement and the wider SHEQ team will take appropriate steps to ensure not only its own compliance but also that these requirements are followed by its suppliers, subcontractors and/or business partners. The Company expects all Managers and employees to support the principles contained in this policy.

3. Responsibility for this Policy

3.1 The Executive Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

3.2 The Group's existing structure of risk management provides the framework to support the Group's compliance with the requirements of this policy and any associated acts, primarily through oversight and assurance from the Board concerning the processes in place for implementing this policy, monitoring its use and effectiveness, ensuring that managers and employees receive adequate training, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. In addition, our commitment to Modern Slavery is embedded in our working practices and within the practises of the Suppliers that we decide to use. We audit suppliers to review supply chains however we initially ensure that Suppliers are aware of their obligations as a "first-flag" indicator.

3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. Managers will remain alert to indicators of modern slavery and will respond appropriately if they find or are informed of any indication of modern slavery.

3.4 All that work with us are responsible for reporting any suspicion of a breach of this policy.

4. Supplier Requirements

4.1 At Adler & Allan, we work to ensure that we do not engage with any organisation that is not fully aware and compliant to our Modern Slavery Policy. This starts with supplier Onboarding

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and is inculcated through each and every tender procured through our MarketDojo tendering portal where suppliers have to re-confirm their commitment to driving out Modern Slavery in all forms.

Suppliers will not participate in, undertake or act in any way to support or facilitate:

a) **Human Trafficking:** the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.
b) **Forced Labour:** all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.
c) **Harmful Child Labour:** consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

4.2 Our suppliers:

a) Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty;
b) Will ensure that the overall terms of employment are in a language workers understand, no deceptive substitution.
c) Will comply with the minimum age requirements prescribed by applicable laws
d) Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements;
e) Will abide by applicable law concerning the maximum hours of daily labour;
f) Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK; and
g) Will ensure that any sub-contractors or suppliers from whom they source goods and/or services for incorporation in those supplied to the Adler and Allan Group Ltd, also adhere to these requirements.

4.3 **Certification:** Suppliers will certify compliance with this Policy and their adherence to relevant human trafficking and slavery laws in each of the relevant countries in which they operate.

4.4 **Audits:** Upon request, Suppliers must be able to demonstrate compliance with this Policy to the reasonable satisfaction of Adler and Allan. The Company may perform periodic audits on this Policy and Suppliers are expected to fully co-operate with any such audit.

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5. Reporting and breach of supplier requirements

5.1 **Reporting:** Any breach of this Policy (including by a Supplier) can be reported confidentially to Human Resources, the Head of Procurement, the SHEQ team, or through the whistleblowing platform. If you are unsure whether an action, worker treatment, or working conditions within our business or supply chain may constitute modern slavery, speak with your manager or HR. The company encourages openness and will support anyone who raises genuine concerns in good faith, even if mistaken. No one will suffer detrimental treatment such as dismissal, disciplinary action, threats, or other unfair treatment for reporting concerns. If you believe you have been treated unfairly after raising an issue, notify the compliance manager immediately. Employees may escalate unresolved matters through the Grievance Procedure. Adler & Allan conduct relationship and site reviews across the Supply Chain to proactively identify risks and address breaches through informed, two-way dialogue. Where concerns suggest potential victims, they will be escalated to safeguarding leads and, if necessary, to the UK Modern Slavery Helpline or the National Referral Mechanism by qualified first responders.

Where appropriate, concerns indicating potential victims will be escalated to safeguarding leads and, if required, to the UK Modern Slavery Helpline or the National Referral Mechanism by qualified first responders.

5.2 **Consequences:** Any breach of this Policy extremely seriously. Suppliers who are found to have or be engaging in human trafficking and slavery or who refuse to co-operate with any audit to verify compliance with this Policy will be liable to have any supply agreement, arrangement or other contract terminated immediately, without compensation. If a Supplier is found in violation of this policy, the Company will take prompt action which may include terminating any supply agreement, arrangement or other contract with that Supplier. It shall also take such other steps as necessary to address the violation and seek to prevent its reoccurrence.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

6. Supply Chain and Business Due Diligence

6.1 In respect of each supplier, we may or will take one or more of the following actions:

a) Inform our Suppliers that we are not prepared to accept any form of exploitation in their business or any part of their supply chain.

b) Our standard supply chain contract templates and contracts that we negotiate with high-risk Suppliers contain anti-slavery provisions which prohibit Suppliers and their employees and sub-suppliers from engaging in modern slavery.

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c) In cases of high risk, we audit the Supplier and, as appropriate, we require them to take specific measures to ensure that the risk of modern slavery is significantly reduced.

d) In any case where modern slavery is inferred or identified in our business or in our supply chain, we require that immediate action is taken to address it, and we provide appropriate support to this end. In the event of failure to resolve the situation with a Supplier rapidly and satisfactorily, we will terminate the contract. We will monitor compliance through contract reviews, data analysis, and (where relevant) tools such as modern slavery assessment questionnaires. Findings will inform improvement plans and commercial decisions.

6.2 The Company's procurement activities take place in England; and associated contractors and suppliers are predominantly UK and EU based. The Company typically hosts between £20m and £25m competitive procurements annually.

6.3 The Company maintains a number of professional services and development framework agreements within the industry; in addition, the Company also maintains a number of other frameworks for exclusive use including legal services. The Company's procurement framework enables users to draw-down professional multi-disciplinary services and development expertise. This includes the services of industry companies, with their associated goods, materials and labour-related supply chains. In a typical year, the Company procures £20m of services through associated frameworks.

6.4 In common with many organisations, employees occasionally stay in UK hotels when conducting business away from the office. Accommodation and travel arrangements are organised by the Company. The Company also occasionally procures meeting and conference venues to support general business activities, and these are selected to ensure good value for money. The Company acknowledges that the hotel and hospitality trade recognise the risk of modern slavery within their sector.

7. Procurement and Tender Process Improvements

7.1 Existing tender documentation includes the mandatory exclusion of any bidder who has been convicted of an offence under the Modern Slavery Act 2015.

7.2 Our procurement approach is reviewed regularly to ensure compliance with UK procurement law and current government guidance on tackling modern slavery in supply chains. Mandatory and discretionary exclusion grounds, selection criteria, award criteria and contract conditions are applied proportionately to risk.

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8. Expectation and Encouragement

The Company expects all organisations within frameworks and other companies engaged to ensure their goods, materials and labour-related supply chains:

- Fully comply with the Modern Slavery Act 2015;
- Transparent, accountable and auditable;
- Free from ethical ambiguities.

The Company encourages organisations within frameworks and other companies engaged apply as appropriate the Modern Slavery Act and other associated legislation.

9. Management responsibility and General Awareness

The Company will;

- Report progress to the Executive Team;
- Continue to raise awareness of this published statement by re-notifying organisations in our frameworks and other companies with which we regularly engage;
- Remind employees of the Company's obligations under the Act.

10. Revision History

Date	Version	Revised by	Notes
31/12/2015	1	Phil Cunliffe – HR Manager	First version released
30/09/2019	2	Phil Cunliffe – HR Manager	Policy updated with 2019 statement
29/01/2021	3	Phil Cunliffe – HR Manager	Policy updated with 2020 statement
27/05/2021	4	Phil Cunliffe – HR Manager	Policy review for Company Employee Handbook
29/09/2023	5	Watershed – HR and Employment Law Specialists & Shaun Milner Head of Procurement	Released in company handbook
21/01/2026	6	Catherine Wilson – Head of HR and Kieren Curry – Group Head of Procurement	Updated to include use of MarketDojo to drive compliance and ensure conscious decision making on behalf of supplier

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