# ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

This policy statement is provided for Collins Construction Ltd (Collins), and relates to financial year ended 30th June 2026.

## OUR COMMITMENT

Collins Construction Ltd ("Collins") is committed to conducting its business ethically, responsibly and with integrity. We have a zero-tolerance approach to modern slavery and human trafficking and are committed to implementing and maintaining appropriate systems and controls designed to prevent modern slavery from occurring within our own business or our supply chains.

Modern slavery is a crime and a violation of fundamental human rights. It can take a number of forms, including slavery, servitude, forced or compulsory labour and human trafficking, all of which involve the deprivation of a person's liberty in order to exploit them for personal or commercial gain.

We recognise our responsibility to understand the potential modern slavery risks associated with our industry and our activities, and to take appropriate and proportionate steps to manage those risks.

This statement sets out our approach to preventing modern slavery and human trafficking within our business and supply chains.

## OUR BUSINESS

Collins is a London-based commercial fit-out and refurbishment company operating principally as a main contractor, delivering construction, refurbishment and fit-out projects for clients across a range of sectors.

The delivery of our projects involves a combination of directly employed personnel, specialist subcontractors, agency workers, professional consultants, suppliers and other service providers.
Our operations are therefore supported by an extensive and diverse supply chain, ranging from major specialist subcontractors and manufacturers through to smaller trade contractors, labour providers, material suppliers and professional service organisations.

We recognise that the nature of the construction industry means that effective management of modern slavery risk requires consideration not only of our directly employed workforce, but also of the wider supply chain supporting the delivery of our projects.

## OUR SUPPLY CHAIN

A significant proportion of the labour, materials and specialist services required to deliver our construction projects is procured through our supply chain. Our supply chain includes, amongst others:

- trade and specialist subcontractors;
- labour and recruitment agencies;
- construction material and product suppliers;
- manufacturers and distributors;
- plant and equipment providers;
- professional consultants; and
- other specialist service providers.

We expect all contractors, suppliers and other business partners working with Collins to conduct their activities ethically and to share our commitment to preventing modern slavery and human trafficking.
Our requirements extend beyond our immediate contractual relationships. We expect our suppliers and subcontractors to apply equivalent standards within their own organisations and supply chains.



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## OUR POLICIES & GOVERNANCE

The Collins Board of Directors has overall responsibility for ensuring that our approach to modern slavery complies with our legal and ethical obligations and that appropriate arrangements are maintained throughout the business.

The Managing Director has primary day-to-day responsibility for the implementation of our approach, monitoring its use and effectiveness and ensuring appropriate systems and procedures are maintained. Management at all levels is responsible for promoting compliance and ensuring those working under their direction understand the standards expected of them.

Our approach is supported by our Anti-Slavery and Human Trafficking Policy, which applies to all persons working for us or on our behalf, including employees at all levels, directors, agency workers, contractors, external consultants, third-party representatives and business partners.

We expect the same high standards from our contractors, suppliers and other business partners. Our contracting arrangements prohibit the use of forced, compulsory or trafficked labour and the use of individuals held in slavery or servitude, whether adults or children. We also expect our suppliers to hold their own supply chains to equivalent standards.
These principles are already established within Collins' existing policy and supply chain onboarding process.

## RISKS WITHIN OUR BUSINESS

We recognise that modern slavery risks are not necessarily uniform across our activities. Within our directly employed workforce, we consider the potential risk to be comparatively low due to the direct employment relationship and visibility that we have over recruitment and employment arrangements.

We recognise that the potential risk can increase further down construction supply chains, where there may be less direct visibility over recruitment, employment and working arrangements. Areas to which we therefore give consideration include:

- subcontracted and agency labour;
- lower tiers of subcontracting;
- labour-intensive trades;
- temporary and migrant labour;
- workers who may be vulnerable due to language, financial or employment circumstances;
- recruitment and labour supply arrangements;
- complex or extended supply chains;
- the sourcing and manufacture of construction products and materials; and

We recognise potential indicators of exploitation may include workers being charged inappropriate recruitment fees, withholding of identity documents, restriction of movement, inappropriate deductions from wages, coercion or threats, excessive working arrangements, debt bondage or circumstances where workers appear unable to freely leave their employment.

## DUE DILIGENCE & REPORTING

Our approach is based on identifying and managing modern slavery risk proportionately to the nature of our business and supply chain. Through our rigorous and layered onboarding process, we seek to work with reputable and competent organisations that share our commitment to responsible and ethical business practices.

Our zero-tolerance approach to modern slavery is communicated to suppliers, contractors and business partners at the outset of our business relationship and reinforced as appropriate thereafter. This requirement forms part of our existing policy arrangements.



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Organisations and individuals working for or on behalf of Collins are required to remain alert to potential indicators of modern slavery and are encouraged to raise concerns regarding any part of our business or any tier of our supply chain at the earliest possible opportunity. Where a concern is identified, it will be appropriately escalated and reviewed.
Depending upon the nature and severity of the matter, action may include further investigation, seeking additional information or assurance from the relevant organisation, requiring corrective action and, where appropriate, reconsidering or terminating the business relationship.

Collins reserves the right to terminate its relationship with individuals or organisations working on its behalf where they breach our requirements relating to modern slavery. We will continue to review our supply chain management arrangements and identify opportunities to strengthen our controls where appropriate, particularly in areas presenting a potentially higher modern slavery risk.

Importantly, the prevention, detection and reporting of modern slavery is the responsibility of everyone working for Collins or under our control. Employees and others working on our behalf are encouraged to raise any concern or suspicion of modern slavery at the earliest possible opportunity.
We encourage openness and will support anyone who raises a genuine concern in good faith, even where that concern subsequently proves to be unfounded. No person should suffer detrimental treatment as a result of raising a genuine concern regarding suspected modern slavery. These reporting and non-retaliation arrangements are established within our existing policy.

**TRAINING & AWARENESS**

We are very aware that policies and contractual requirements alone cannot eliminate the risk of modern slavery. Awareness amongst our employees and those managing our supply chain is an important part of our approach. Training on our Anti-Slavery and Human Trafficking Policy, including awareness of the risks modern slavery can present within construction supply chains, forms part of our induction arrangements.

Collins is responsible for ensuring that employees understand the requirements of our policy and have access to appropriate training, advice and guidance. We also communicate our zero-tolerance approach to suppliers, contractors and business partners and reinforce these expectations where appropriate throughout our business relationships.

**POLICY EFFECTIVENESS & CONTINIOUS IMPROVEMENT**

We recognise that the effectiveness of our approach to modern slavery should be assessed through the operation of our controls and not simply through the existence of policies. We therefore monitor and consider appropriate indicators of effectiveness, including:

- proactive mechanisms for reporting of modern slavery concerns, suspicions or incidents;
- concerns are investigated in every instance;
- issues identified through supply chain management and assurance activities always investigated;
- relevant training and awareness activities provided to all staff;
- concerns or non-conformances identified in relation to labour or employment practices always investigated;
- corrective actions required from members of our supply chain following identified concerns;
- the continued review and improvement of our policies and control arrangements.

We do not consider the absence of reported incidents, in isolation, to demonstrate that modern slavery risk has been eliminated. An effective approach also requires continued awareness, transparency and a culture in which employees and supply chain partners are encouraged to identify and report concerns.

Where issues or opportunities for improvement are identified, these will be considered as part of our ongoing


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review of our policies, training, procurement and supply chain management arrangements. Our arrangements are therefore subject to ongoing review, taking account of changes within our business, our supply chains, legislation and industry practice.

We will continue to develop our understanding of modern slavery risks within the construction sector and strengthen our due diligence, supply chain engagement, awareness and monitoring arrangements where appropriate. Collins remains committed to working with our employees, clients, subcontractors, suppliers and other business partners to prevent slavery and human trafficking from occurring within our business or supply chains.

This policy will be reviewed at least annually, or sooner subject to legislative changes, to verify that it is fit for purpose and in effective operation.



**Jason Warren**
**Managing Director**
November 2026



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