

MODERN SLAVERY POLICY STATEMENT



**GEOFFREY
ROBINSON**
SINCE 1971

Purpose and Scope

Geoffrey Robinson Ltd ("the company") recognises that preventing modern slavery and human trafficking requires more than the implementation of policies and procedures.

This policy sets out the company's approach to preventing modern slavery and human trafficking in its own operations and supply chains and to complying with section 54 of the Modern Slavery Act 2015. It applies to all employees, workers (including agency and casual staff), directors and all third parties who supply goods, services or labour to the company.

The Company has zero tolerance for all forms of modern slavery and human trafficking, including forced or compulsory labour, debt bondage, child labour that is not in line with ILO standards, and exploitation associated with migrant or temporary labour.

We are committed to assessing modern slavery and human trafficking risks in our operations and supply chains, taking proportionate steps to prevent, mitigate and remediate those risks and the effectiveness of our approach through ongoing monitoring, review and continuous improvement. We believe that effective modern slavery prevention requires active engagement with our workforce, suppliers, subcontractors and other stakeholders to identify, manage and reduce risks throughout our business and supply chain.

As a construction and building services contractor, we recognise that potential modern slavery risks may arise through subcontracted labour, temporary labour, recruitment practices, specialist trades, materials procurement and lower-tier supply chains. Our controls and assurance activities are therefore focused on the areas of greatest potential risk.

Responsibility for reviewing the effectiveness of our modern slavery controls sits with **Andy Talbot, Managing Director**, supported by representatives from **procurement, supply chain, financial, commercial, operations, SHEQ and human resources**. The effectiveness of our arrangements is reviewed annually and findings are reported to senior management to ensure appropriate oversight, accountability and continual improvement.

Governance and Oversight

The prevention of modern slavery forms part of Geoffrey Robinson Ltd's wider commitment to ethical business practices, responsible procurement, worker welfare, legal compliance and social value.

Oversight of modern slavery risks is provided **by the company board**. This includes review of relevant policies, supplier due diligence, training completion, incident reporting, audit findings, corrective actions and opportunities for improvement.

Modern slavery and human trafficking risk and performance are formally reported and reviewed at [NUMBER] of board meetings per annum.

Where risks, weaknesses or improvement opportunities are identified, these are reviewed by the relevant business function and escalated where required. Actions may be incorporated into business improvement plans, procurement updates, training programmes, management briefings or project delivery processes.

The Company remains committed to maintaining effective systems and controls to prevent modern slavery and human trafficking and to continually strengthening its approach in line with legislation, industry guidance, client expectations and recognised best practice.

Policies and Procedures Supporting Modern Slavery Prevention

Geoffrey Robinson Ltd maintains a range of policies, procedures and management controls which support the prevention of modern slavery and human trafficking within its business and supply chain and should be read alongside it. These include:

- Modern Slavery and Human Trafficking Policy
- Whistleblowing Policy
- Equality, Diversity and Inclusion Policy
- Recruitment and Right to Work Procedures
- Supplier and Subcontractor Pre-Qualification Procedures
- Procurement and Supply Chain Management Procedures

- Health, Safety, Environmental and Quality Management Procedures
- Site induction, supervision and welfare arrangements
- Disciplinary and grievance procedures

Risk Assessment and Supply Chain Assurance

Geoffrey Robinson Ltd adopts a risk-based approach to the identification and management of modern slavery and human trafficking risks throughout its operations and supply chain.

Whilst the majority of our workforce is directly employed or sourced through established recruitment channels, we recognise that risks can arise through the use of subcontracted labour, temporary labour, specialist trade contractors, labour-only subcontractors, agency workers, imported construction products and lower-tier supply chains.

To mitigate these risks, the Company undertakes a range of due diligence activities, including:

- Verification of supplier competence and business legitimacy through pre-qualification and accreditation processes.
- Review of supplier policies relating to modern slavery, ethical employment and labour standards.
- Supplier and subcontractor approval processes prior to appointment.
- Confirmation that workers have a legal right to work in the United Kingdom.
- Ongoing monitoring of supplier and subcontractor performance throughout project delivery.
- Site-based management oversight of workforce welfare, working conditions and employment arrangements.
- Escalation procedures for concerns relating to labour standards, worker welfare or suspected exploitation.

Whilst the Company does not mandate the use of SSIP-accredited schemes, recognising that such requirements can be restrictive and disproportionately costly for some small and medium-sized enterprises, we do recognise these accreditations as valid supporting evidence where held by suppliers and subcontractors (e.g. Constructionline, CHAS, SafeContractor and other recognised assessment schemes). However, such accreditations are relied upon only where they clearly demonstrate compliance with relevant legal, health and safety, employment, ethical labour and modern slavery requirements and are supplemented by our own supplier due diligence, right-to-work verification, supply chain review and ongoing project monitoring processes.

Supplier and subcontractor due diligence is managed through our controlled approval, onboarding and procurement processes, which form part of our ISO 9001-certified management system. All organisations are assessed prior to appointment against health and safety, insurance, financial stability, governance, ethical business practice, equality and modern slavery requirements, with supporting information independently verified where appropriate. Following approval, suppliers and subcontractors remain subject to ongoing performance monitoring through site supervision, compliance audits, formal performance reviews and supply chain management processes to ensure continued compliance with our standards and expectations.

Supply Chain Due Diligence

Geoffrey Robinson Ltd expects suppliers, subcontractors and business partners to comply with all applicable laws and to operate in a manner consistent with our commitment to preventing modern slavery and human trafficking.

As part of our supplier management arrangements, we may request information relating to:

- Modern slavery policies or statements
- Labour standards and ethical employment practices
- Use of agency or temporary labour
- Right to work checks
- Wage compliance
- Working time arrangements
- Worker welfare and site conditions
- Lower-tier subcontracting arrangements
- Training and awareness
- Reporting and whistleblowing procedures

Where a supplier or subcontractor is considered higher risk, the Company may undertake additional checks, including management review, project-level monitoring, requests for additional evidence and corrective action plans.

Higher risk trades include the following which are flagged at the point of entry: labour-only subcontractors, temporary labour agencies, specialist trade contractors, cleaning and facilities management providers, security services, waste management contractors, logistics providers, suppliers utilising migrant labour, or organisations with complex lower-tier supply chains.

For the reporting period ending **31st December 2025**, Geoffrey Robinson Ltd achieved **100%** completion of appropriate due diligence or approval checks for all new suppliers and subcontractors.

Workforce and Recruitment Controls

Geoffrey Robinson Ltd is committed to ensuring that all workers are treated fairly, ethically and in accordance with applicable employment legislation.

The Company maintains recruitment procedures designed to minimise the risk of forced labour, involuntary labour, debt bondage or human trafficking. These controls include:

- Verification of identity
- Right to work checks
- Written terms and conditions of employment
- Compliance with applicable wage requirements
- Employment record management
- Access to grievance and reporting routes
- Oversight of working hours, welfare and employment arrangements

Recruitment and right to work checks are managed by the Company's **Human Resources team**. Where agency labour is used, the Company utilises approved labour providers that have been assessed against our supplier approval process, including verification of right-to-work procedures, employment practices, worker welfare arrangements, modern slavery controls and compliance with relevant employment legislation.

Temporary Labour and Labour Providers

The Company recognises that temporary labour can present an increased modern slavery risk if not properly managed. Our approach includes:

- Using approved labour providers wherever possible.
- Verifying legal right to work.
- Ensuring workers are provided through legitimate employment routes.
- Monitoring site arrangements for signs of exploitation.
- Escalating concerns where indicators of modern slavery are identified.

For the reporting period ending **31st December 2025**, Geoffrey Robinson Ltd achieved 100% compliance with labour provider approval requirements.

Materials Procurement

Geoffrey Robinson Ltd recognises that modern slavery risks may exist not only in labour supply, but also in the procurement of construction materials, plant and equipment.

The Company seeks to work with reputable suppliers who can clearly demonstrate appropriate standards of legal and ethical compliance. Our procurement approach includes:

- Use of well-established suppliers.
- Supplier screening and approval processes.
- Close consideration of compliance and accreditation information.
- Supplier performance review where concerns arise.

Geoffrey Robinson Ltd seeks to develop long-term relationships with a core network of preferred suppliers and manufacturers who consistently demonstrate high standards of quality, compliance, ethical conduct and performance.

Suppliers are subject to a structured due diligence/approval and screening process prior to appointment and ongoing monitoring throughout delivery, including assessment of health and safety, financial standing, governance, labour practices and modern slavery controls.

Supplier performance is reviewed through project feedback, compliance monitoring and supply chain management processes, with poor or sub-standard performance requiring corrective action sign off failing which a supplier will be disapproved or not considered for future opportunities. This approach promotes transparency, early supply chain engagement, continual improvement and greater assurance that materials are sourced through responsible and ethical supply chains.

Procurement teams are required to challenge unusual sourcing arrangements, significant departures from market pricing, unverified supply chains or supplier substitutions that may introduce additional compliance risks. If adequate assurance cannot be sought, they will not proceed to engagement.

Training, Awareness and Reporting

Raising awareness remains a key component of our approach to preventing modern slavery. Employees, managers and supervisors are encouraged to remain vigilant to indicators of modern slavery, including:

- Restricted freedom of movement
- Unusual working arrangements
- Withholding of identity documents
- Signs of coercion or intimidation
- Poor welfare conditions
- Concerns regarding worker treatment

Core modern slavery and human trafficking awareness training is delivered through our training provider "Safety Services Direct". This is reinforced by supplementary training provided to individuals through our membership of "Supply Chain Sustainability School" as well as [new employee] inductions, periodic toolbox talks and management briefings from advisory bodies, specialist employment advisor and external legal counsel who provide legal assurance.

For the reporting period ending **31st December 2025**, 100% of relevant employees, managers and supervisors had completed modern slavery awareness training or briefing.

Whistleblowing and Incident Reporting

Geoffrey Robinson Ltd encourages employees, workers, subcontractors and suppliers to report any concerns relating to modern slavery, worker exploitation or unethical employment practices. Reports may be raised through:

- Line management
- Site management
- HR
- SHEQ
- Senior management

Individuals can also raise anonymous concerns through "Protect" (an independent whistleblowing charity) by contacting the helpline on 020 3117 2520 or via their website <https://protect-advice.org.uk>.

Our whistleblowing policy is provided to all employees upon induction, issued upon renewal, displayed in all offices and sites and is readily available on the company intranet. All concerns are carefully triaged and investigated wherever appropriate.

Victim Support and Incident Management

If a potential victim of modern slavery or human trafficking is identified, Geoffrey Robinson Ltd will seek to respond in a manner that is focussed on protecting the individual from further harm. The Company's response may include:

- Immediate escalation to senior management.
- Engagement with relevant NGOs and law enforcement authorities.
- Supplier or subcontractor investigation.
- Review of policies and procedures.
- Corrective action implementation.

Where a potential victim is identified, the matter will be immediately escalated to the Managing Director and relevant members of the senior management team. The Company's priority will always be the safety and welfare of the individual concerned.

Appropriate actions may include engaging with the client, labour provider, subcontractor, police, local authority, Modern Slavery Helpline or other relevant agencies, securing evidence, suspending affected work activities and implementing immediate safeguarding measures.

Following investigation, any corrective actions identified will be tracked to completion and the effectiveness of existing controls reviewed to prevent recurrence.

Performance Indicators

To evaluate the effectiveness of our efforts to prevent modern slavery and human trafficking, Geoffrey Robinson Ltd monitors the following key performance indicators:

- Modern slavery training completion rates.
- Supplier and subcontractor due diligence completion rates.
- Number of supplier reviews undertaken.
- Number of project audits incorporating labour compliance checks.
- Number of concerns raised and investigated.
- Number of corrective actions completed within agreed timescales.
- Improvements implemented as a result of monitoring, audits and reviews.

Performance During the Reporting Period

For the reporting period ending **31st December 2025**, Geoffrey Robinson Ltd achieved the following outcomes:

- 100% of relevant employees completed modern slavery awareness training or briefing.
- 100% of new suppliers and subcontractors completed due diligence and approval checks.
- 135 supplier compliance reviews were undertaken.
- 56 project audits or inspections included labour compliance and welfare checks.
- 0 modern slavery concerns were raised and investigated.
- 100% of corrective actions were completed within agreed timescales.
- 0 confirmed incidents of modern slavery were identified.

Outcome Statement

No confirmed instances of modern slavery, servitude, forced labour, compulsory labour or human trafficking were identified within Geoffrey Robinson Ltd's directly employed workforce or supply chain during the reporting period.

Whilst no incidents have been identified, Geoffrey Robinson Ltd does not measure success solely by the absence of reported cases. We seek to continually improve awareness, transparency, supply chain engagement and worker welfare standards to reduce the risk of exploitation and strengthen our ability to identify and respond to potential concerns.

Effectiveness Review

The Company reviews the effectiveness of its modern slavery controls by considering:

- Employee awareness and understanding of modern slavery risks.
- Completion of supplier due diligence.
- Identification and monitoring of higher-risk suppliers.
- Site management oversight of worker welfare and labour standards.
- Investigation and closure of concerns raised.
- Completion of corrective actions.
- Improvements made to policies, procedures, procurement and training arrangements.

The outcome of this review is reported annually to **the Company's Board of Directors**.

Objectives for the Next Reporting Period

During the next reporting period, Geoffrey Robinson Ltd will:

- Continue to strengthen supplier and subcontractor due diligence processes.
- Improve record keeping relating to workforce and supply chain compliance.
- Deliver refresher training and awareness activities.
- Undertake targeted reviews of higher-risk suppliers and labour providers.
- Review whistleblowing arrangements and reporting routes.
- Review the effectiveness of existing anti-slavery controls.
- Improve the recording of modern slavery checks within procurement and project delivery processes.

Progress against these objectives will be reviewed annually by **the Company's Board of Directors**.

Statement Approval

This policy statement has been reviewed and approved by **Andy Talbot, Managing Director** on behalf of Geoffrey Robinson Ltd.

Signed:



Name: **Andy Talbot**

Position: **Managing Director**

Date: **31/03/2026**