

MODERN SLAVERY POLICY STATEMENT



**GEOFFREY
ROBINSON**
SINCE 1971

Organisation Structure and Supply Chain Mapping

Geoffrey Robinson Ltd is a UK-based construction and building services contractor operating principally throughout the North of England and wider UK construction sector. The Company delivers installations, maintenance, refurbishment and building services projects across both public and private sector environments.

The Company engages directly c.300 employed personnel alongside a controlled network of approved suppliers, subcontractors and labour providers. Our supply chain includes manufacturers, wholesalers, specialist trade contractors, temporary labour providers, logistics organisations, professional service providers and other construction-related supply chain partners.

Whilst the majority of suppliers are UK-based organisations, certain construction materials, equipment and manufactured products may originate from global supply chains. The Company therefore recognises the importance of assessing modern slavery risks not only within its direct operations but throughout its wider supply chain. We employ 200+ directly employed labour operatives reducing reliance on third party labour.

Geoffrey Robinson Ltd is a privately owned UK limited company. The Company has no parent company, subsidiaries or associated group undertakings and operates as a standalone legal entity. The Company is not currently engaged in any joint ventures, consortium arrangements or other collaborative corporate structures. Accordingly, governance, operational management and modern slavery oversight are exercised directly by Geoffrey Robinson Ltd across its own operations and supply chain.

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 all scheduled

Board meetings (12 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.

Stakeholder Engagement

Stakeholder engagement forms an important part of Geoffrey Robinson Ltd's approach to identifying, assessing and managing modern slavery and human trafficking risks.

The Company recognises that effective prevention requires collaboration with those who may be directly or indirectly affected by labour practices within our operations and supply chains. We therefore seek to engage with a range of internal and external stakeholders including employees, agency workers, subcontractors, suppliers, clients, industry bodies, professional advisers and training providers.

Through regular supplier engagement, workforce communication, project reviews, management meetings, audits, training activities and participation in industry initiatives such as the Supply Chain Sustainability School, the Company seeks to promote awareness, share good practice and identify emerging risks.

Feedback, concerns, lessons learned and improvement opportunities identified through these engagement activities are considered by senior management and, where appropriate, incorporated into policy reviews, procurement procedures, training programmes, management systems and business improvement plans.

The Company remains committed to maintaining open and transparent dialogue with stakeholders to strengthen its understanding of modern slavery risks and continually improve the effectiveness of its controls and management arrangements.

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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 Company maintains visibility of its direct suppliers and subcontractors, we recognise that transparency

beyond Tier 1 suppliers remains an area for further development. Some manufactured products used within construction projects pass through multiple tiers of production, distribution and sourcing. During future reporting periods the Company will continue developing greater understanding of these lower-tier supply chains and associated risks.

The Company maintains a structured risk-based approach to assessing modern slavery and human trafficking risks throughout its operations and supply chain. Risk assessments take account of factors including the nature of the goods or services provided, labour intensity, use of agency or temporary labour, levels of subcontracting, recruitment practices, geographic considerations, supply chain complexity, previous performance, audit findings and any concerns raised through monitoring or whistleblowing arrangements.

Higher-risk activities and suppliers are identified through the Company's supplier approval, procurement and project review processes. Organisations assessed as presenting an elevated level of risk may be subject to enhanced due diligence measures, including additional management review, requests for supporting documentation, increased audit activity, site inspections, workforce interviews, project-level monitoring and targeted compliance reviews.

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.
- Workforce engagement activities, welfare inspections and worker discussions to identify concerns relating to labour standards, working conditions or potential indicators of exploitation.
- Escalation procedures for concerns relating to labour standards, worker welfare or suspected exploitation.

As part of ongoing project monitoring and assurance activities, site management teams engage directly with workers to understand working conditions, welfare arrangements and any concerns relating to recruitment practices, payment arrangements, working hours, treatment or other indicators of labour exploitation.

Whilst the Company does not mandate the use ofSSIP-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.

Whilst the Company maintains visibility and oversight of its directly contracted suppliers, subcontractors and labour providers, we recognise that complete transparency throughout all lower-tier supply chains remains an ongoing area of development. Certain products, materials and manufactured goods used within construction projects may pass through multiple tiers of production, processing and distribution before reaching the Company. During future reporting periods, Geoffrey Robinson Ltd will continue to strengthen its understanding of these extended supply chains and associated modern slavery risks through supplier engagement, due diligence and ongoing supply chain review activities.

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 will seek to respond in a manner that prioritises the safety, welfare and rights of the individual concerned.

The Company is committed to taking a victim-centred approach to incident management and recognises that immediate termination of a supplier relationship may not always be in the best interests of affected workers. Any response will therefore seek to protect individuals from further harm whilst appropriate investigations are undertaken.

Where a concern is identified, the matter will be immediately escalated to the Managing Director and relevant members of the senior management team. Depending on the circumstances, actions may include:

- Immediate safeguarding and welfare support.
- Engagement with the client, labour provider, supplier or subcontractor.
- Referral to relevant authorities, law enforcement agencies, the Modern Slavery Helpline or specialist support organisations.
- Preservation of evidence and investigation of the circumstances.

- Suspension of affected work activities where necessary.
- Corrective action plans and enhanced monitoring.
- Review of procurement, recruitment and supply chain controls.

Where exploitation is identified within the Company's operations or supply chain, Geoffrey Robinson Ltd will seek to work collaboratively with relevant organisations and authorities to support appropriate remediation, safeguarding and prevention measures.

Following the conclusion of any investigation, lessons learned will be reviewed and, where appropriate, incorporated into policies, procedures, training programmes and supply chain controls to prevent recurrence.

Key Performance Indicators

To evaluate the effectiveness of our efforts to prevent modern slavery and human trafficking, Geoffrey Robinson Ltd monitors and reviews a range of key performance indicators. These indicators are reported through the Company's governance arrangements and are used to assess the effectiveness of our controls in preventing modern slavery within our business and supply chain.

The Company's performance indicators and target measures include:

- 100% of new suppliers and subcontractors to complete the Company's due diligence and approval process prior to appointment.
- 100% of labour providers utilised by the Company to meet supplier approval requirements and demonstrate compliance with applicable employment legislation.
- 100% completion of right-to-work checks for directly employed personnel and agency workers engaged through approved labour providers.
- 100% completion of modern slavery awareness training, briefings or communications for relevant employees involved in recruitment, procurement, commercial management and supply chain activities.
- 100% completion of corrective actions relating to modern slavery, labour standards or worker welfare concerns within agreed timescales.
- Annual review of all high-risk suppliers, subcontractors and labour providers identified through the Company's risk assessment processes.
- Completion of project and supplier audits incorporating labour compliance and worker welfare checks in accordance with the Company's audit programme.
- Monitoring and investigation of 100% of concerns raised through management reporting, whistleblowing procedures or other reporting channels.
- Target of zero substantiated incidents of modern slavery, forced labour or human trafficking within the Company's directly controlled operations.
- Ongoing implementation of improvement actions arising from audits, reviews, supplier assessments, lessons learned and management evaluations.

Performance against these indicators is reviewed annually by senior management and reported to the Board. Where performance falls below target or potential concerns are identified, appropriate corrective actions, enhanced due diligence measures, additional audits, supplier engagement activities or further training initiatives are implemented to support continual improvement.

Progress Since Previous Reporting Period

During the reporting period Geoffrey Robinson Ltd continued to strengthen its arrangements for identifying, assessing and managing modern slavery risks. Improvements implemented included enhanced supplier due diligence reviews, increased focus on labour provider verification, expanded workforce welfare monitoring and the introduction of formal performance indicators to support measurement of control effectiveness. These developments support the Company's commitment to continual improvement and greater transparency in relation to modern slavery risk management.

Performance During the Reporting Period

During the reporting period ending 31 December 2025, Geoffrey Robinson Ltd monitored performance against its modern slavery and human trafficking key performance indicators.

Performance achieved during the reporting period included:

- 100% of new suppliers and subcontractors completed the Company's due diligence and approval process prior to appointment, meeting the Company's target of 100%.
- 100% of labour providers engaged by the Company met supplier approval requirements and

demonstrated compliance with applicable employment legislation, meeting the Company's target of 100%.

- 100% completion of right-to-work verification checks for all directly employed personnel and agency workers engaged through approved labour providers, meeting the Company's target of 100%.
- 100% of relevant employees completed modern slavery awareness training, briefings or communications during the reporting period against a target of 100%.
- 135 supplier and subcontractor reviews were completed, including assessments of labour standards, ethical employment practices and worker welfare arrangements.
- 56 project audits incorporating labour compliance and workforce welfare checks were undertaken in accordance with the Company's audit programme.
- 0 concerns relating to modern slavery, forced labour or human trafficking were raised through management reporting channels, workforce engagement activities or the Company's whistleblowing arrangements.
- 0 concerns were raised and therefore no investigations were required during the reporting period.
- 0 substantiated incidents of modern slavery, forced labour or human trafficking were identified within the Company's directly controlled operations, achieving the Company's target of zero incidents.
- 100% of corrective actions arising from supplier reviews, audits or compliance monitoring activities were completed within agreed timescales against a target of 100%.
- Three improvement actions were implemented during the reporting period comprising enhanced supplier modern slavery assessment questions, strengthened labour provider verification requirements and expanded workforce welfare checks within project audit activities..

The Company considers these results to demonstrate the effectiveness of its current approach to managing modern slavery and human trafficking risks throughout its operations and supply chains. Performance against these indicators is reviewed by senior management and reported to the Board. Where trends, risks or areas for improvement are identified, appropriate corrective and preventive actions are implemented to strengthen controls and support continual improvement.

Based on the results achieved against the Company's key performance indicators, Geoffrey Robinson Ltd believes its modern slavery controls, supplier due diligence procedures, workforce management practices and reporting arrangements were effective during the reporting period in identifying and mitigating the risk of modern slavery and human trafficking within its operations and supply chains.

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.

Our Focus for 2026-2027

We will continue strengthening our framework through four key themes:

1. Awareness & Training
 - Develop advanced learning pathways for employees and supply-chain partners.
 - Enhance induction and onboarding content to highlight responsibilities.
 - Host an annual awareness campaign each October.
2. Controls & Governance
 - Implement on-site controls and enhanced reporting mechanisms to identify risk indicators.
 - Introduce targeted audits for high-risk suppliers.
 - Develop greater visibility of lower-tier supply chains and improve supply chain mapping activities for higher-risk procurement categories.
3. Engagement & Collaboration
 - Deepen collaboration with the Supply Chain Sustainability School.
 - Increase engagement with high-risk partners through workshops and briefings.

- Increase workforce engagement activities and worker welfare discussions during project delivery and audit programmes.

4. Policy & Reporting

- Continue to develop policies and tools to address modern-slavery risks.
- Measure the effectiveness of training and guidance to ensure continual improvement.

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**