

MODERN SLAVERY POLICY

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BOARD SIGN OFF STATUS	APPROVED

1. INTRODUCTION

Loppingdale Plant Limited trading as LPL Construction Services is a construction company that operates in various sectors, undertaking capital projects. With approximately 115 employees, LPL Construction acts as both a main contractor and subcontractor. We are dedicated to preventing slavery and human trafficking violations within our own operations and supply chain. We recognise that modern slavery is a crime and a violation of human rights, taking various forms including labour exploitation, human trafficking, bonded labour, and child labour.

2. OUR APPROACH

In accordance with the Modern Slavery Act 2015, LPL Construction Services maintains a zero-tolerance stance against modern slavery and human trafficking in any form within our business and supply chain. We are committed to conducting our business ethically and with the utmost integrity, ensuring that modern slavery and human trafficking are not present in our operations or supply chain. This commitment extends to all individuals and organisations that provide us with goods or services, including labour supplied by employment agencies. We understand that the risks associated with modern slavery and human trafficking can exist in any aspect of our operations, whether it be through direct employment, subcontracted services, or the supply of materials.

This Policy applies to all employees, officers, consultants, self-employed contractors, subcontractors, volunteers and agency workers.

To assess and manage these risks, we have implemented the following measures:

LPL Construction Services approach to assessing managing the risk is:

- We have a zero-tolerance policy towards modern slavery and human trafficking.
- Our Board of Directors holds overall responsibility for this policy.

- The Compliance Director -- Grant Rayne is responsible for monitoring the effectiveness of this policy on a day-to-day basis.
- Our policies require subcontractors and consultants to acknowledge their responsibility for adhering to the Modern Slavery Act 2015, which is evaluated through our PQQ process. Any breaches will be thoroughly reviewed and investigated.
- We provide training to our key employees on the risks associated with modern slavery and human trafficking.
- We establish clear expectations through our Code of Conduct.
- We have developed a Modern Slavery Risk Assessment.
- Our contractual terms include obligations for subcontractors and suppliers to comply with our policies where their policies maybe absent.
- We conduct checks on new recruits to ensure their eligibility to work in the UK.
- We continually monitor the effectiveness of our actions in mitigating the risks of modern slavery and human trafficking through auditing.
- We assess the effectiveness of this policy through our Whistle-Blowing Policy.
- We report our progress annually through our Social Development Goals (SDG) Report.
- This policy is supported by several associated processes, including Recruitment, New Supplier Selection, Code of Conduct, Employee Handbook, and Company Mission Statement.

3. IDENTIFYING ILLEGAL WORKING PREVENTION

LPL will ensure all checks are carried out on potential employees, no assumptions are made about an individual right to work based on any characteristic.

LPL will use the following methods;

- Manual document check of original documentation
- Home Office On-line right to work checks for individuals with digital immigration status or biometric cards
- Identity Service Provider (IDSP) (for British and Irish citizens with valid passports)

All checks are recorded and dated with a follow up system in place for those with time limited permissions to work.

Copies of all documents are retained securely for the duration of their employment + 2 years after the date of leaving.

LPL will never withhold and employees original documents.

What to do if you suspect:

The safety, protection, and support of individuals is always our top priority. If you suspect someone is in slavery, DO NOT confront them directly, as this may increase the risk of immediate harm.

Assess the situation and report it to a manager, the Compliance Team, or HR if you are confident that you are safe to do so. If you are uncomfortable speaking directly, you can;

- Refer to our Whistleblowing Policy.
- If there is an immediate risk of harm, contact the police at 999.
- If there is no immediate risk, contact the Modern Slavery Helpline at 08000 121 700. They provide 24/7 support and language assistance, with an option for anonymity.
- Alternatively, you can contact Slave Free Alliance at 0300 008 0044 (9am-5.30pm) or email info@slavefreealliance.org.

This policy will be reviewed annually or whenever any significant changes occur within the organisation or whenever any legislative change requires and will have an impact upon the policy.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 for the current financial year. It is approved by the Board of Directors and published on the LPL Construction Services website, with a link provided from our homepage.