

MODERN DAY SLAVERY ACT 2015 POLICY STATEMENT

Organisational Structure

ESG Limited is committed to conducting business with the highest ethical standards and in full compliance with the Modern Slavery Act 2015. We are firmly against modern slavery in all its forms, including but not limited to human trafficking, forced labour, and child labour. We commit to respecting all human rights, in alignment with international human rights standards, including the Universal Declaration of Human Rights. This commitment is a core aspect of our corporate values and is embedded in all levels of our business operations.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit for personal or commercial gain. We all have a responsibility to be aware of the risks, however small in our business and wider supply chain. As a company operating within the construction industry, we understand that modern slavery can pose enhanced risks within our supply chains and workforce, and we are dedicated to preventing these practices. Staff are expected to report concerns, using appropriate reporting channels and management are expected to act upon them.

This statement sets out the actions we have taken and the policies we have put in place during year ending 31 December 2024 to combat modern slavery within our business and supply chains, and to ensure transparency and accountability in our operations.

Our Business and Supply Chain

ESG Limited is a construction company involved in providing MEP solutions to the construction industry, across a variety of sectors including data centres, life sciences, residential, commercial, fit out and offsite modular engineering. The organisation operates within the construction industry and employs more than 280 P.A.Y.E. staff across the site network and head office.

We operate across the UK, and our supply chain includes a wide range of contractors, subcontractors, and suppliers providing materials, labour, and services. Our business is organised for operational purposes across multi-site locations, a factory setting in Rochford and a London office; all overseen by Head Office in Romford.

Given the complexity and scale of our industry, we are aware of the potential risks of modern slavery within both direct and indirect areas of our operations, particularly in the recruitment of labour and sourcing of materials. We are committed to preventing any form of modern slavery from taking place in our business and among our supply chain partners.

We procure a wide range of goods and services through a diverse supply chain, which includes:

- Main contractors
- Subcontractors who provide materials, labour and plant
- Manufacturers and suppliers who deliver direct to site or to the Subcontractor
- Utility companies, and
- Professional and specialist consultants linked to core activity.



Several of our suppliers will have turnovers which trigger a requirement to comply with the obligation to produce a Slavery and Human Trafficking Statement under the Act.

We have a stable supply chain allowing us to benefit from a significant number of long-standing trading relationships with like-minded Subcontractors, Suppliers and Consultants who share our values and ethics. We actively encourage all our suppliers, notwithstanding the contents of the Act, to ensure that they comply with the spirit and intent of the Act.

The materials that are ordered directly by our Head Office or indirectly by our subcontractors are procured, in the main, under a National Supply Agreement by our centrally based Procurement Department who apply due diligence and tender processes via supplier evaluations.

Our Commitment to Ethical Business Practices

We are fully committed to eliminating modern slavery from our operations. In line with this commitment, we have implemented several proactive measures:

- 1. Due Diligence and Risk Assessment:** We conduct rigorous due diligence on all new suppliers, contractors, and subcontractors, particularly those in higher-risk areas such as labour recruitment, material sourcing, and overseas suppliers. We assess the risk of modern slavery within these operations and take appropriate steps to ensure compliance with ethical labour standards.
- 2. Supplier Management:** Our human rights and social performance standards apply not only to our operations but also to our suppliers and subcontractors. We are committed to combatting slavery and human trafficking. We do not trade directly with any company outside of the U.K. unless specifically instructed to do so by a client. All suppliers, contractors, and subcontractors are expected to comply with our human rights and labour standards as a condition of doing business with us. This agreement specifically requires that all new suppliers confirm their understanding of the Modern Slavery Act 2015 and that they operate in full compliance with the Act; ensuring that workers are treated fairly, with dignity and respect.
- 3. Recruitment and Workforce Management:** We have established robust recruitment practices to ensure all workers, whether directly employed or contracted, are hired ethically. We ensure that workers are provided with contracts that clearly outline their rights and responsibilities, and we avoid reliance on agencies that may use exploitative practices. We support and promote freedom of association and the right to collective bargaining, ensuring our employees and those within our supply chain have a voice in their work conditions without fear of discrimination or retaliation. Our recruitment and selection process ensures that all offers of employment state that all applicants are required to provide proof of their Right to Work in the UK, in accordance with the amendment to the Immigration, Asylum, and Nationality Act 2006. We only procure agency labour from agencies affiliated with trade boards which we know are compliant ethically and legally. We commit to audit these organisations for confirmation that they continue to source staff ethically and provide the correct pay and conditions. We are proud to be a Living Wage employer. All employees are paid directly into a bank account nominated by them. Employees have access to their own

Payroll profiles via ADP and can edit this information with multifactor authentication for security.

4. **Training and Awareness:** To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide ongoing training for our employees and contractors, particularly those involved in procurement, project management, and recruitment. The training covers the risks associated with modern slavery, how to spot potential indicators of exploitation, and the steps to take should any concerns arise. We do this via a variety of online training and toolbox talks.
5. **Monitoring and Auditing:** To ensure ongoing compliance, we regularly monitor our supply chains and perform audits where necessary. We assess compliance with our ethical standards and investigate any reports of suspected modern slavery or exploitation.
6. **Whistleblowing and Reporting Mechanisms:** We have put in place a clear and confidential whistleblowing mechanism for workers, suppliers, and other stakeholders to report any concerns about modern slavery. All reports are treated with the utmost seriousness and are investigated thoroughly.
7. **Remediation and Corrective Action:** Should any instances of modern slavery be identified; we are committed to taking immediate corrective action. This may include providing support to affected individuals, working with relevant authorities, and reviewing and amending our practices and relationships with suppliers or subcontractors.
8. **Compliance Team -** We have a dedicated compliance team, which consists of representatives from the following departments: Audit and Compliance, Human Resources, Finance, Health, Safety & Wellbeing and Procurement.

Our Policies

To support our commitment to combat modern slavery, we have implemented the following policies:

- **Anti-Slavery and Human Trafficking Policy** – sets out our commitment to preventing modern slavery and the procedures for addressing any incidents.
- **Whistleblowing Policy** – ensures that any concerns about unethical or illegal practices, including modern slavery, can be reported safely and anonymously.
- **Equal Opportunities and Diversity Policy** – promotes equality, diversity, and the fair treatment of all workers.

Conclusion

At ESG Limited, we are fully committed to preventing modern slavery in all its forms and ensuring that all individuals involved in our operations are treated with fairness, dignity, and respect. We recognise that the construction industry presents unique challenges, and we are committed to working proactively with our suppliers and contractors to reduce risks of exploitation and modern slavery.



Further Steps

This statement is approved by the Board of Directors of ESG Limited and is reviewed annually to ensure that it remains current and effective in addressing modern slavery risks within our business and supply chain.

We will continue to review the effectiveness of this policy and will look to ensure that we are adopting best practice and enforcing effective systems to prevent, monitor and eliminate slavery and Human trafficking.

For transparency, the company will publish the Modern-Day Slavery and Trafficking Act 2015 Policy Statement on its website for public review.

This policy applies to all those employed by Essex Services Group Ltd.

A handwritten signature in black ink, appearing to read 'Andy Hider'.

Andy Hider
Joint Managing Director

A handwritten signature in black ink, appearing to read 'ACecil'.

Adam Cecil
Joint Managing Director

Reviewed: March 2025

Next Review Due: March 2026