



Modern Slavery Policy

Scomac Services is committed to ensuring that modern slavery*, which may include human trafficking, is not associated with any of our activities, including activities in our supply chain. We will make reasonable enquires to all those in our immediate service supply chair, to ensure their activities are not associated with modern slavery.

This policy statement reflects our commitment to act ethically and with integrity: all managers and supervisors should be alert to the risk, however small, of modern slavery. Staff should report any concerns to management, and management will be expected to take positive action. Our statement relates to actions and activities during the financial year to 30 April 2023.

**Modern Slavery can include not just slavery, but also the trafficking of people, forced labour and servitude. While it is not generally expected in engineering contracting companies, there may be an increased risk of encountering it in certain sub-contractors and suppliers.*

Key Responsibilities Responsibility within Scomac Services is as follows:

Policy:	The Board
Investigation/Due Diligence:	The Directors
Training & Information:	Company Secretary

The following outlines our approach to identifying and preventing any association with modern slavery, which may include human trafficking:

Whistle blowing policy: We encourage all workers, customers and partners to report any concerns about modern slavery, without fear of negative consequences. Employees, customers or others who have concerns can report using a confidential disclosure form. We will seek to ensure the anonymity of, and protect, those who report any concerns. To ensure sufficient understanding of the risks of modern slavery we brief employees and encourage open discussion, about this issue.

Employee conduct: we make it clear to employees what actions and behaviours are expected, in relation to identifying and avoiding any association with modern slavery. We will maintain high standards of employee conduct and ethical behaviour when managing this issue in our supply chain.

Supplier conduct: all our service suppliers are required to show they provide safe working conditions, treat all workers with dignity, and act ethically and entirely within applicable national and UK law concerning the use of labour. As part of our approach to identifying and mitigating the risk of modern slavery, we:

- make our expectations of ethical behaviour, and zero tolerance to modern slavery, clear to all our service suppliers;
- aim to build long-standing, ethical, relationships with our immediate suppliers.

Agency workers policy: in addition to sub-contractors, we will check and assess the legal compliance and ethical policy of all agencies, before accepting any agency workers.

Modern Slavery Policy

Due Diligence

We undertake due diligence when considering new service suppliers, and we review our existing suppliers annually. Our due diligence measures include:

- conducting supplier assessments
- taking steps to improve sub-standard supplier practice, including providing advice or other information to the supplier, and requiring immediate and timely improvement plans
- sanctions against suppliers that fail to improve their performance with a timely action plan. This may include ending the business relationship.

Performance Indicators

We will use the following key performance indicators (KPIs):

- Require relevant staff to have completed briefings or training on modern slavery
- Developing a service supply checking system
- Evaluation potential service suppliers before they enter our supply and
- Review of our supply chains

Training and Information

Our training and information covers:

- our procurement practices, which may influence supply chain conditions and which should prevent the use of labour engaged on unrealistically low wages or wages below a relevant national minimum wage;
- how to assess the risk of slavery in relation to various aspects of our business;
- how to identify the most obvious indications of slavery;
- what steps to take if slavery is suspected;
- how to escalate potential slavery issues to top management;
- what external help is available e.g. the 'Modern Slavery' Helpline at: <https://www.modernslaveryhelpline.org/>
- what guidance can be given to suppliers and other business partners and contractors to implement anti-slavery and human trafficking policies; and
- what steps we take if suppliers do not implement anti-slavery and human trafficking policies, including removal from our supply chain
- Awareness Raising
- We also raise awareness of modern slavery issues by [distributing flyers to staff/putting posters in our premises/circulating emails to staff]. These measures explain:
 - the basic aims of the UK's Modern Slavery Act 2015;
 - how employers can identify and help to prevent modern slavery;
 - what employees can do to flag up potential slavery and/or human trafficking issues, and to whom; and
 - external information and advice (e.g. via the Modern Slavery Helpline).



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This statement will be reviewed annually, or as required and if necessary, updated.

David McCloskey
Director

Dated: 30 September 2025