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|  Swallow [™] SITE SERVICES | SSS-IMS-POL-005 Annual Modern Slavery Policy Statement | Issue/Revision | 1.3 |
| | | Date | Dec 2024 |

SWALLOW SITE SERVICES LIMITED

INTEGRATED MANAGEMENT SYSTEM


SSS-IMS-POL-005

ANNUAL MODERN SLAVERY POLICY STATEMENT

Calendar Year 2025

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Introduction

This is our annual policy statement outlining the steps we take to understand and manage the risk of modern slavery occurring within our organisation or supply chain.

The statement has been broken down into the following sections:

1. Who we are. Our Business and the Supply Chain
2. What is Modern Slavery?
3. Our Policies
4. Risk Assessment and application
5. Training & Awareness
6. Endorsement

1. Who we are. Our Business and the Supply Chain

Established in 2001, Swallow Site Services is a trusted provider of building and maintenance services, delivering tailored, professional solutions to businesses across England & Wales. Our expertise spans multiple sectors, offering comprehensive, fully integrated solutions to property maintenance and asset improvement challenges. With over 20 years of experience, we have evolved from our origins as a specialist contractor in railway property, to become a versatile and reliable partner for businesses of all kinds. We understand that property and the Built Environment are incredible assets – they are the foundation of modern life - where we live, work, learn, and play. However, we also recognise the financial, legal, social, and sustainability challenges they present.


Our people and our supply chain play a huge part in providing our services. We recognise that the execution of our services involves labour being procured throughout our business and supply chains and understand that this entails at least some risk that modern slavery may take place.

100% of our supply chain are British-based companies. Everyone in our supply chain will be sent this policy as part of our trading requirements.

2. What is Modern Slavery?

Modern slavery is an abhorrent crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking - all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business undertakings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in either our own business, or in any of the businesses of our supply chain.

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|  | SSS-IMS-POL-005 Annual Modern Slavery Policy Statement | Issue/Revision | 1.3 |
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3. Our Policies

We have several policies and procedures, all forming part of our Integrated Management System (IMS), that help us manage our modern slavery risk, including a separate Prevention of Illegal Working Policy & Procedure (SSS-IMS-POL-034).

Our policies and procedures in relation to the Modern Slavery Act 2015

- Prevention of Illegal Working Policy (SSS-IMS-POL-034)
- Business Ethics Policy (SSS-IMS-POL-006)
- Corporate Social Responsibility Policy (SSS-IMS-POL-035)
- Sustainable Development Policy (SSS-IMS-POL-036)
- Anti-Fraud, Bribery, and Corruption Policy & Procedure (SSS-IMS-POL-037)
- Equality, Diversity and Inclusion [EDI] Policy (SSS-IMS-POL-010)
- Whistleblowing Policy (SSS-IMS-POL-027)
- Dignity at Work Policy (SSS-IMS-POL-013)
- Fairness, Grievance and Disciplinary Policy (SSS-IMS-POL-0018)
- Employee Recruitment/Hiring Procedure (SSS-IMS-PROC-021)
- Communications Procedure (SSS-IMS-PROC-014)
- Worker Consultation Procedure (SSS-IMS-PROC-015)
- Legal Requirements Procedure (SSS-IMS-PROC-005)
- Procurement Procedure (SSS-IMS-PROC-019)
- Control of Subcontractors Procedure (SSS-IMS-PROC-018)
- Evaluation of Compliance Procedure (SSS-IMS-PROC-008)

Our policies and procedures enable us to have a joined-up approach to tackling the threat of modern slavery.

Our policies will be shared with interested parties on request and this Annual Modern Slavery Policy Statement will be made available on our website.


4. Risk Assessment, Prevention & Mitigation

The nature of our services and procurement levels presents a relatively low-risk of modern slavery. However, we are committed to ensuring that there is transparency in our business and in our approach to tackling modern slavery that is consistent with our obligations under the Modern Slavery Act 2015.

We are committed to implementing systems and processes to ensure that there is zero-tolerance towards any acts of modern slavery within our business and throughout our supply chains.

We will ensure that consideration of the modern slavery risks and prevention are added to our Integrated Management System's review process as an employer and procurer of goods and services.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

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We will not enter into business with any organisation which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

5. Training & Awareness

As an equal opportunities employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We will continue to embed the principles through providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking.

We will ensure that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.


Our employees have a personal responsibility to report any actual or suspected instances of modern slavery throughout the business or supply chain to our Compliance Manager. We will provide awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking.

Senior Management are committed to implementing and enforcing effective systems which prevent, monitor and eliminate Slavery and Human Trafficking.

In adhering to this policy, we will: -

- Include, as part of our contracting processes within our supply chain, obligations to ensure compliance with the requirements of the Modern Slavery Act 2015.
- Encourage openness and provide support to anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is, or may be, taking place in any part of our own business or in the businesses of any of our supply chains.
- Communicate our zero-tolerance approach to modern slavery with our supply chain and business partners at the outset of our business relationship with them.

Our employees are collectively and personally responsible for the communication, understanding and practical application of this policy. This policy will be made available to all new employees at recruitment stage and to our supply chain and to any other interested parties upon request. Revisions will be communicated to those affected by the changes.

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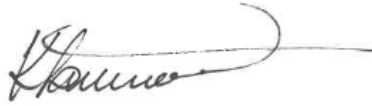
6. Endorsement

This statement was approved by:

- James Stroud, Commercial & Compliance Manager
- Mathew Lee, National Contracts Manager
- John Cronin, National Operations Manager
- Rachel Wilkinson, Offices Manager

Signed by

Karl Lawrence
Managing Director



31st December 2024