

## **Modern Slavery and Human Trafficking Statement**

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes the Company's Anti-Slavery and Human Trafficking statement for the current calendar year.

### **Introduction**

This document sets out Optima Contracting Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the last financial year.

As part of the construction industry the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensure that its supply chains are free from slavery and human trafficking.

### **Organisation Structure**

Founded in 1986 we are a construction company based mainly in the UK with additional offices in Dubai and Malaysia.

The head office is in High Wycombe, Buckinghamshire with UK offices in London, Manchester, Aberdeen and a manufacturing facility in Radstock, Somerset where we design and manufacture our own products.

### **Our Policies on Slavery and Human Trafficking**

We are committed to ensuring that modern slavery or human trafficking plays no part in our supply chain or in any part of our business.

We are committed to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to, as far as practical, ensure slavery and human trafficking is not taking place anywhere in the organisation or supply chain.

### **Our Supply Chain**

Our supply chain comprises the engagement of subcontractor organisations to carry out works and services on our construction sites and the sourcing of materials and manufactured products.

### **Supplier Adherence**

We have zero tolerance to slavery and human trafficking and we expect all those in our supply chain and contractors to comply with our values.

## **Further steps**

We shall undertake an annual review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains with a view to identify further steps that we can take.

This statement has been approved by the organisation's Board of Directors who will review and update it annually.

## **Responsibilities**

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Risk assessments**

Where considered a risk e.g. due to location of supplier (Tier 1) they shall be assessed to ensure compliance with the act, in addition in certain industries where there is a high risk of slavery (e.g. forestry), the company shall put measures in place to ensure sustainable resourcing is achieved (e.g. procuring FSC timber product only).

- **Investigations/due diligence**

When a risk has been identified the Health, Safety, Quality and Environment (HSQE) Team in conjunction with HR, will assess and investigate any potential breach to the legislation.

- **Employment and Training**

We operate a robust recruitment processes in line with UK employment laws, including: 'right to work' document checks; contracts of employment and checks to ensure everyone employed is 16 and above. We expect our supply chain to operate a similar policy and be able to demonstrate similar checks are in place. We reward our staff to at least market-related pay levels, which are reviewed annually.

Staff involved in the selection of suppliers and subcontractors are trained in their responsibilities by being briefed in the requirements of this policy.

- **Due Diligence**

The organisation undertakes due diligence when considering taking on new suppliers and regularly review our existing supplier chain to ensure continued compliance.


- **Supply chain**

We operate a supplier policy and maintain a preferred supplier/subcontractor list and endeavour to place contract/orders with local companies where practicable. We conduct due diligence on all suppliers before allowing them to become a

preferred supplier, this includes them completing a questionnaire and supplying details which relate to the modern slavery act. We have a zero tolerance approach to slavery and human trafficking and we expect our suppliers and contractors to uphold the same values.

We will not conduct business knowingly with anyone engaged in slavery and human trafficking practices or knowingly permit them to be carried out in any part of our business. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations is in breach of this policy. We issue our Sustainable Procurement Code of Conduct to our suppliers and subcontractors which enhances our requirements that fair and safe working conditions are available to our staff and those of our suppliers.

Signed .....



Date .....

24<sup>TH</sup> DECEMBER 2024

Nick Caley  
Group CEO  
Optima Contracting Limited