

<b>Modern Slavery Policy Statement</b>	<b>SWGR/CPoS/014</b>
	<b>Issue 7: January 2025</b>
<b>Applicability: SWGR Group</b>	<b>Page 1 of 3</b>

## INTRODUCTION

The foundation of SWGR 'Modern Slavery Policy' is the Company's commitment to find practical, meaningful and culturally appropriate responses to support the elimination of such labour practices. It has been formulated in consideration with relevant legislation and it supports the need for appropriate initiatives to progressively eliminate these abuses.

SWGR has a zero-tolerance approach to Modern Slavery. SWGR is committed to preventing acts of slavery and human trafficking from both its business and supply chain, and imposes those same high standards on its contractors, suppliers and other business partners.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that SWGR has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. SWGR has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings, and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or supply chain. We will address and prohibit practices that are known to increase the risk of modern slavery, including disengagement should modern slavery practices be identified in the business or our supply chain.

This policy applies to all persons working for us on our behalf in any capacity, including employees at all levels, directors, senior management, contracts supervisors, procurement personnel, office staff, site operatives, agency workers, seconded workers, volunteers, interns, contractors, external consultants, third party representatives and business partners.

This policy does not form part of any employees' contract of employment and we may amend it any time. Any amendments to this policy will be communicated to all staff working for the business.

## RESPONSIBILITY FOR THE POLICY

The Directors of SWGR have overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all under our control comply with it. The business unit leads have primary and day to day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those representing them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## **ORGANISATION**

As a business we endeavour to provide exceptional services to the numerous the private and public sector industry, their clients, and asset owners. We are committed to providing the highest level of professionalism, service response, and quality workmanship.

The Managing Director has the ultimate accountability for ensuring that the requirements of the policy are implemented, maintained, reviewed and improved and for ensuring all applicable compliance obligations are met.

## **OUR POLICIES**

SWGR operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

## **RECRUITMENT**

We operate a robust recruitment processes including conducting eligibility to work in the U.K. checks for all employees to safeguard against human trafficking or individuals being forced against their will.

## **WHISTLE BLOWING POLICY**

We operate a whistle blowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our organisation or supply chain, without fear of reprisals.

## **TRAINING**

To ensure a high level of understanding of the uses of modern slavery and human trafficking in our supply chains and our business we aim to develop training for our staff, primarily delivered through our online induction process. This will raise awareness and enable people to spot the signs of potentially illegal practices.

## **REVIEW**

This policy will be monitored regularly not exceeding an annual basis and re-amended with any changes to the law and/or the Modern Slavery Act 2015. Any changes to the policy will be communicated to all category of the workforce including sub-contracted personnel.

**Signed:**



**Raj Sinha**  
**Group Managing Director**

## Types of slavery today

Modern slavery takes many forms. The most common are:

- **Human trafficking.** The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal
- **Forced labour.** Any work or services people are forced to do against their will, usually under threat of punishment
- **Debt bondage/bonded labour.** The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt
- **Descent-based slavery (where people are born into slavery).** A very old form of slavery, where people are treated as property, and their "slave" status has been passed down the maternal line.
- **Child slavery.** When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery
- **Forced and early marriage.** When someone is married against their will and cannot leave. Most child marriages can be considered slavery
- **Domestic servitude.** Domestic work and domestic servitude are not always slavery, and when properly regulated can be an important source of income for many people. However, when someone is working in another person's home, they may be particularly vulnerable to abuses, exploitation, and slavery, as they might be hidden from sight and lack legal protection.