

Modern Slavery Policy – January 2024

1.0: Introduction

Leyton Group Ltd (LG) recognises that all businesses have an obligation to prevent slavery and human trafficking and will do all in its power to prevent slavery and human trafficking within its business and within the supply chains through which it operates.

2.0: Policy Statement

Forced or compulsory labour, human trafficking and other kinds of slavery represent some of the gravest forms of human rights abuse in any society.

Modern slavery can take many forms including the trafficking of people, forced labour, servitude and slavery. We all have a responsibility to be alert to the risks in both the LG business and our supply chain.

Our own processes around candidate engagement ensure our employees are alert to the signs of exploitation, in order that we may take the necessary action promptly and effectively should it be identified.

This statement focuses specifically on LG compliance with the Modern Slavery Act 2015 (the Act) and highlights the steps we take to ensure there is no slavery or human trafficking occurring within the organisation or its supply chains.

One of our Company's most valuable assets has always been its reputation for integrity and fairness. Maintaining this reputation within our market is an essential pre-requisite to our continued success.

- LG is committed to conducting all aspects of its business in an ethical and transparent manner. We acknowledge our duties & responsibilities under the Act.
- LG values require that all workers are treated with dignity and respect. We are fundamentally opposed to slavery, human trafficking, forced labour, debt bondage, the sale or exploitation of children and all exploitative practices in the workplace.
- LG requires that all contractors and suppliers do not engage in any such practices, and do not knowingly themselves contract with third parties which do.
- LG values require that it terminates business relations with any contractor or supplier found to be in breach of anti-slavery and human trafficking obligations.
- Employees should be free to choose to work for their employer and to leave the company upon reasonable notice.

- All employees must be provided with a clear contract of employment, which complies with local legislation.
- All employees must be treated in a fair and equal manner and with dignity and respect.
- Any form of discrimination, victimisation or harassment on the grounds of marital or civil partnership status, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, having or not having dependants, religious belief or political opinion, age, trade union activity and offending background should be prohibited.
- All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to, without any unauthorised deductions.
- Suppliers should observe the provisions of the International Labour Organization such that any young persons under the age of 18 should not be employed to work at night or for any hazardous work and their employment should not harm the young person's education, health or physical, mental, moral or social development.
- No young persons may be employed below the age of 16.
- All slavery and human trafficking laws must be complied with including, but not limited to, the UK Modern Slavery Act 2015.
- Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in the UK or elsewhere, both internally and within their supply chains and other external business relationships.
- LG are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

3.0: Organisation's Structure

Leyton Group Ltd is a privately-owned limited business registered and operated in The United Kingdom.

4.0: Our Business

Our business consists of Architectural and Structural Steel construction.

5.0: Our Supply Chain(s)

LG work in partnership with many Main Contractors & sub-contractors and other suppliers to fulfil our contractual obligations to our customers. In common with many companies operating in the construction industry, our supply chain is complex; there are often many tiers of suppliers between LG and the source of the raw materials and labour used on construction sites.

We have adopted, or are in the process of adopting, various procedures to ensure that both our existing and potential supply partners understand our values, standards and requirements regarding the prevention of modern slavery and human trafficking within supply chains.

LG expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant and professional manner and expect our suppliers to promote similar standards in their own supply chain.

6.0: Ongoing Review

LG will continue to review and evolve our anti-slavery and human trafficking policies and procedures over time, as we gradually make progress in the adoption of a common approach throughout our business.

7.0: Failure to Comply

A failure to comply with the Act, and/or this policy statement will be deemed to be a material breach of the terms of our standard commercial agreements and contracts of employment. This statement is made pursuant to Section 54(1) of the Act and constitutes LG's slavery and human trafficking statement.

Signed: 06th January 2024

Fraser McFarlane
Managing Director

