



# **Modern Slavery and Human Trafficking Policy**

# Policy Statement

Approved Roofing NE Ltd has a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

We are committed to ensuring transparency and fairness in our business operations and to improving our practices to combat slavery and human trafficking.

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## 1. Scope of the Policy

This policy applies to all persons working for Approved Roofing Ltd or on our behalf in any capacity, including employees, directors, agency workers, contractors, subcontractors, consultants, suppliers, and third-party representatives.

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## 2. Our Business and Supply Chain

Approved Roofing Ltd is a UK-based roofing contractor providing professional roofing services to residential, commercial, and public sector clients across London and the wider UK. We work with a network of trusted suppliers and subcontractors to source materials, labour, and specialist services.

We understand that some areas of construction and material supply chains may be vulnerable to modern slavery practices, and we are committed to identifying and mitigating these risks.

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## 3. Our Commitments

- To comply with the Modern Slavery Act 2015 and all other applicable legislation.
- To prevent modern slavery, forced labour, and human trafficking in any form within our operations and supply chain.
- To conduct appropriate due diligence on new suppliers and subcontractors.

- To include anti-slavery and human trafficking provisions in our contracts and procurement processes.
  - To raise awareness and educate our staff on identifying and reporting signs of modern slavery.
  - To investigate all reports or suspicions of modern slavery thoroughly and take appropriate action.
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## 4. Due Diligence and Risk Assessment

Approved Roofing Ltd conducts risk assessments to identify and assess potential areas of exposure to modern slavery, especially when engaging new suppliers or working in high-risk sectors or regions. Our approach includes:

- Reviewing suppliers' policies and ethics statements.
  - Checking suppliers' compliance with employment laws and wage regulations.
  - Ensuring subcontractors meet our standards before engagement.
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## 5. Training and Awareness

We ensure that all employees are aware of the risks of modern slavery and are trained to recognise the signs and understand their responsibilities under this policy. This includes:

- Induction training for new staff.
  - Toolbox talks and ongoing refresher sessions.
  - Training for procurement staff and site supervisors on supplier oversight.
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## 6. Reporting Modern Slavery

All employees and workers are encouraged to report concerns about modern slavery or unethical behaviour in any part of our business or supply chain. We provide a confidential mechanism for reporting:

- Directly to line managers or directors.
- Via our internal reporting procedure.
- Through anonymous reporting where necessary.

We will support anyone who raises genuine concerns in good faith and ensure there is no victimisation.

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## 7. Breach of Policy

Any employee or person working on behalf of Approved Roofing Ltd who is found to have breached this policy may face disciplinary action, including dismissal. Suppliers and subcontractors who are found to be involved in modern slavery or who fail to uphold our standards may have their contracts terminated.

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## 8. Policy Review

This policy is reviewed annually by senior management to ensure its effectiveness and compliance with evolving legal requirements and industry best practices.

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**Approved by:**

**Aaron Dolan**

Managing Director – Approved Roofing NE Ltd

**Date:** 16 June 2025

**Next Review Due:** 16 June 2026