SpellerMetcalfe

STATEMENT

HR85S MODERN SLAVERY STATEMENT

1. Introduction

This statement is made by Speller Metcalfe Ltd in accordance with Section 54 of the Modern Slavery Act 2015 and outlines the steps we have taken to prevent modern slavery, human trafficking and labour exploitation within our business operations and supply chains.

Speller Metcalfe Ltd is committed to conducting business ethically and with integrity. We recognise our responsibility to take a robust and proactive approach to preventing all forms of modern slavery and protecting the rights, welfare and dignity of all workers associated with our business.

2. Our Organisation and Structure

Speller Metcalfe Ltd is a UK-based construction company in Malvern, Worcestershire, with a regional office in Wolverhampton. We operate solely within the United Kingdom and utilise both regional and national supply chains.

The construction sector can present elevated risks due to:

- The use of agency and temporary labour
- Labour-only subcontracting arrangements
- Complex supply chains involving multiple tiers of suppliers
- Project delivery pressures and tight programme requirements

We believe these risks are reduced through:

- Direct supervision and oversight by Speller Metcalfe employees across our sites and operations
- Robust employment and procurement controls
- The requirement for workers on our sites to hold valid CSCS cards or equivalent recognised qualifications
- Verification of right-to-work documentation
- Use of reputable labour providers and approved suppliers
- Operating solely within the UK under established employment legislation
- Use of the MSite platform to undertake and verify Right to Work checks for off-site workers, strengthening our due diligence processes and reducing the risk of modern slavery, human trafficking, and illegal working practices.

SpellerMetcalfe

STATEMENT

3. Governance and Responsibility

The Board of Directors has overall responsibility for ensuring that Speller Metcalfe meets its obligations under the Modern Slavery Act 2015.

Day-to-day responsibility is shared across the relevant business functions according to their areas of responsibility. Procurement, Commercial and Operational teams are responsible for appropriate supply-chain due diligence, supplier management and operational controls. HR is responsible for employment-related controls, including directly employed workers, recruitment practices, relevant policies, employee training and awareness, and supporting the appropriate escalation of concerns.

These functions work collaboratively to support the Company's approach to identifying, managing and mitigating modern slavery risks.

Modern slavery risks and controls are reviewed periodically as part of our wider governance and risk management processes.

4. Policies Supporting Our Commitment

Our approach to preventing modern slavery is supported by a range of policies and procedures which promote ethical working practices and provide clear reporting mechanisms.

These include:

- **HR65 Whistleblowing Policy -** Outlines how workers can make disclosures without fear of retaliation. Employees, customers or others who have concerns are encouraged to contact their line manager or the Whistleblowing Officer with any concerns, including, but not limited to Modern Slavery.
- **HR69 Employee Code of Conduct -** Defines the ethical actions and behaviours expected of all employees and suppliers.
- **HR61P Foreign Worker Policy -** Outlines our processes and requirements to ensure adequate provisions for non-English speaking personnel to work safely on our sites
- **HR60P Equality, Diversity & Inclusion Policy -** Supports our commitment to providing a workplace free from discrimination, bullying, harassment and victimisation, where all individuals are treated with dignity and respect.
- Recruitment and Right-to-Work Verification Procedures
- Procurement and Supplier Management Processes

These policies support our commitment to:

- Ethical recruitment
- Fair treatment of workers

- Responsible sourcing
- Equality and inclusion
- Safe reporting of concerns
- Compliance with employment legislation

All employees and supply chain partners are expected to uphold these standards.

5. Worker Rights and Ethical Employment Principles

We are committed to protecting the rights and wellbeing of all workers and ensuring employment is freely chosen.

We:

- Pay directly employed employees at least the Real Living Wage
- Provide clear written terms and conditions of employment
- Verify workers' identities and rights to work in the UK
- Prohibit forced labour, bonded labour and human trafficking
- Prohibit the use of child labour
- Respect freedom of movement and freedom of association
- Do not retain workers' passports or personal identity documents except where legally required for administrative purposes
- Prohibit recruitment or placement fees being charged to workers
- Ensure overtime arrangements comply with employment legislation
- Maintain workplaces free from discrimination, harassment, bullying and victimisation

6. Risk Assessment and Supply Chain Management

We undertake ongoing risk assessments across our operations and supply chains.

This includes:

- Identifying activities with increased risk, including agency labour and labour-only subcontracting
- Assessing risks associated with labour models, project delivery pressures and supplier relationships
- Reviewing geographical, operational and supply chain risk factors
- Developing greater visibility of supply chains beyond Tier 1 suppliers
- Monitoring high-risk suppliers, trades and labour providers

Where risks are identified, proportionate controls and mitigation measures are implemented.

7. Due Diligence Processes

We apply a risk-based approach to supplier selection, onboarding and ongoing management.

This includes:

- Supplier prequalification and compliance checks
- Communicating our modern slavery expectations during onboarding
- Obtaining supplier declarations and confirmations of compliance
- Reviewing Modern Slavery Statements where applicable
- Verification of labour providers and recruitment agencies
- Risk-based supplier segmentation
- Enhanced due diligence for higher-risk suppliers
- Ongoing supplier performance monitoring
- Site inspections, audits and compliance checks

Suppliers are expected to demonstrate compliance with all relevant legislation and actively work to prevent modern slavery within their own operations and supply chains.

Serious or persistent breaches may result in suspension or termination of commercial relationships.

8. Managing and Mitigating Risk

We actively manage modern slavery risks through:

- Strong operational supervision and project oversight
- Responsible procurement practices
- Verification of worker competency and qualifications
- Right-to-work verification processes
- Avoidance of unrealistic pricing and delivery expectations
- Regular site inspections and audits
- Engagement with recognised industry bodies and initiatives

We recognise that preventing modern slavery requires continuous review, monitoring and improvement.

9. Reporting, Investigation and Remediation

We encourage employees, workers, suppliers and other stakeholders to raise concerns regarding any suspected instance of modern slavery, human trafficking or labour exploitation.

Concerns may be reported through:

- Line management arrangements
- The HR Department
- The Whistleblowing Procedure
- Supply chain reporting routes
- External reporting bodies and support organisations

Where concerns are identified:

- Reports will be acknowledged and escalated promptly
- Appropriate safeguarding measures will be implemented
- Investigations will be conducted confidentially and proportionately
- Relevant authorities and agencies will be engaged where appropriate
- Corrective actions will be agreed and monitored

We recognise that the identification of concerns demonstrates effective due diligence and provides opportunities to strengthen our systems and controls.

The welfare, safety and protection of affected individuals will always be the priority.

10. Training and Awareness

We provide regular training and awareness initiatives to ensure employees understand modern slavery risks and their responsibilities.

Relevant employees undertake mandatory modern slavery training every two years covering:

- The different forms of modern slavery
- Warning signs and risk indicators
- Risks within the construction industry and supply chains
- Reporting routes and escalation procedures
- Responsible procurement practices
- Appropriate responses when concerns are identified

Awareness is also promoted through:

- Site inductions
- Toolbox talks
- Safety Hub communications
- Internal communications
- Site and office posters
- Modern Slavery Helpline information
- Worker rights awareness campaigns

SpellerMetcalfe

STATEMENT

11. Measuring Effectiveness

To measure the effectiveness of our approach, we monitor a range of Key Performance Indicators (KPIs), including:

- Percentage of relevant employees completing modern slavery training
- Percentage of suppliers providing evidence of modern slavery compliance
- Percentage of high-risk suppliers subject to enhanced due diligence
- Number of audits completed
- Number of concerns reported and investigated
- Status of corrective actions and remediation activities
- Supply chain engagement and awareness activities undertaken

Performance is reviewed periodically to identify trends and opportunities for improvement.

12. Continuous Improvement

We are committed to:

- Continue to review and update relevant policies and procedures
- Further develop supply chain mapping and visibility beyond Tier 1 suppliers
- Enhance risk-based supplier assessments
- Expand awareness raising across our supply chain
- Continue to monitor training completion and effectiveness
- Strengthen supplier engagement in higher-risk areas
- Review emerging legislation, guidance and industry best practice

13. Transparency and Publication

This statement is published on the Speller Metcalfe website and is submitted to the UK Government Modern Slavery Statement Registry where applicable.

We are committed to transparent reporting and continuous improvement in our efforts to prevent modern slavery and labour exploitation.

SpellerMetcalfe

STATEMENT

Policy control	
This policy does not form part of any employee's contract of employment and may be amended at any time. Failure to comply with this policy may result in disciplinary action, up to and including dismissal. This policy applies in full to Speller Metcalfe Ltd and all subsidiary companies within the Speller Metcalfe Group, and extends to all directors, employees, workers and persons acting on behalf of or undertaking activities for any such entity.	
James Speller Managing Director Speller Metcalfe Limited	
Adrian Speller Managing Director Speller Metcalfe Limited	
Revision date – 13/10/2026	**Next revision date – 13/10/2027**