

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This statement sets out Leedex 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 financial year 1 April 2020 to 31 March 2021.

As part of 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 ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Leedex:

- Construction activities and management thereof including use of sub-contractors working across various industry sectors.

Countries of operation and supply

The organisation currently operates in the following countries:

United Kingdom

The following is the process by which the company assesses whether particular activities or countries are high risk in relation to slavery or human trafficking:

- Whilst there is a risk in the UK, the risk is less than that in some other countries. Most of our supply chain use skilled labour who are typically trained and work for reputable companies.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- At present we do not feel that any of our activities or use of subcontractors are at high risk of slavery or human trafficking.

Responsibility

- **Policies:** Outsourced HR Department PrivilegeHR Ltd In conjunction with Managing Directors of Leedex.
- **Risk assessments:** Assessment made on case-by-case basis with the background of any organisations being reviewed prior to placement of any orders.
- **Investigations/due diligence:** Investigation will be carried out by our Outsourced HR PrivilegeHR Ltd.

- **Training:** The directors of the company have taken advice and training on where and what to look for as well as taking advice from our third-party HR advisor.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations [select the relevant policies from the list below and include links to the full text]:

- **Whistleblowing policy:** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can [use our confidential helpline/complete our confidential disclosure form].
- **Employee code of conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- **[Recruitment/Agency workers] policy:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier.
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular [provide examples such as participation in "Stronger together" or "Ethical trading" initiatives];
- using details of ethical supplier database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular.

Training

The organisation requires all staff working in the United Kingdom supply chain managers/HR professionals within the organisation to complete training on modern slavery.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by circulating a series of emails to staff.

- the basic principles of the Modern Slavery Act 2015.
- how employers can identify and prevent slavery and human trafficking.
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Board/Member approval

This statement was approved on 8th August 2025 by the organisation's board of directors, who review and update it annually.

Signed: Hootan Tayefi (Director)

