



Modern Slavery & Human Trafficking Policy

This policy sets out KDD Construction LTD's approach to preventing modern slavery and human trafficking in our business operations and supply chains. We are committed to acting ethically and with integrity in all our dealings and to implementing effective systems to prevent and detect modern slavery.

1. Scope

This policy applies to all individuals working for KDD Construction LTD or on our behalf, including:

- Employees
- Contractors
- Agency workers
- Suppliers and service providers
- Business partners

It applies across all locations in which we operate.

2. Our Commitment

We have a zero-tolerance approach to modern slavery and human trafficking and expect the same high standards from all those we work with. We are committed to:

- Complying with the Modern Slavery Act 2015;
- Ensuring modern slavery is not taking place within our organisation or supply chains;
- Conducting risk assessments where appropriate;
- Taking immediate action if any instances of modern slavery are identified.

3. What is Modern Slavery?

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, and human trafficking. Victims are often forced to work through coercion, threats, or deception, and may suffer physical or psychological abuse.

Examples include:

- Workers being forced to work to repay debts;
- Workers being underpaid or not paid at all;
- Workers living in poor conditions and unable to leave;
- Being recruited and moved solely for exploitation.

4. Risk Assessment and Due Diligence

We assess the risk of modern slavery in our operations and supply chains and take appropriate action. This includes:

- Evaluating the risk of modern slavery when considering new suppliers;
- Conducting supplier due diligence, including self-assessment questionnaires;
- Reviewing existing supplier relationships regularly;
- Including anti-slavery clauses in contracts where appropriate.



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5. Employee Responsibilities

All employees have a responsibility to:

- Read and understand this policy;
- Be vigilant to potential signs of modern slavery;
- Report any concerns or suspicions immediately.

We provide training where appropriate to raise awareness of modern slavery, particularly for employees involved in procurement, recruitment, or supply chain management.

6. Reporting Concerns

If you suspect that someone is a victim of modern slavery or human trafficking, whether inside or outside of the business, you must report it immediately. You can report to:

- Your line manager;
- HR;
- Managing Director.

All concerns will be treated seriously, investigated sensitively, and managed confidentially. No one will suffer any detriment for reporting a concern in good faith.

7. Suppliers and Third Parties

We expect all suppliers and third-party partners to:

- Comply with this policy and the Modern Slavery Act 2015;
- Ensure their own supply chains are free from slavery and trafficking;
- Cooperate with any audits or requests for information.

We may terminate relationships with individuals or organisations working on our behalf if they are found to be involved in slavery or human trafficking.

Signed:

Rumen Kehayov – March 2025

Managing Director