

**MODERN SLAVERY AND HUMAN TRAFFICKING POLICY**

Coulson Building Group, comprising Coulson Group Limited, Coulson & Son Limited and Coulson Joinery Limited maintains relationships with many different organisations in its supply chain, as well as employing people directly. In light of the general law on employment and human rights, and more specifically the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chain.

All our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf, are expected to be familiar with the content of this Policy.

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

Whilst recognising our obligation to ensure that modern slavery and human trafficking is not taking place in our supply chain, we acknowledge that we do not control the conduct of individuals and organisations in our supply chain. However, we will inform our supply chain of our Modern Slavery and Human Trafficking Policy and request they inform us of the measures they are taking to ensure modern slavery is not taking place in their organisation or their own supply chain and to confirm compliance with the Act. Based upon the response received and other factors such as the nature and profile of the supplier, we will risk assess whether further checks should take place. Following the risk assessment, we will consider whether further contractual measures need putting into place.

The Directors have overall responsibility for ensuring the Company complies with our legal and ethical obligations. However, all Senior Managers, Site Managers and the Procurement Team in particular, will receive training on modern slavery and the signs to watch for and be informed of our Whistle Blowing Policy and are responsible for ensuring those reporting to them are given adequate guidance on the issue of modern slavery.

The Whistleblowing Procedure applies to all employees and can be found on the Company’s intranet site. The Company must be made aware immediately of any suspicious activity and reported to a Director in any of the following circumstances:-

- You suspect a person acting on behalf of the Company is seeking to exploit another in a way which could amount to modern slavery;
- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
- You have received an approach from a person who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- You have information which leads to the rational conclusion that a person acting on behalf of the Company or a supplier is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

The source of reports will be kept confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures for the prevention of modern slavery being committed on our behalf or in any element of our supply chain.



Paul Glover  
Managing Director