



Modern Slavery & Human Trafficking Policy

MSP 01h

1. Introduction

1.1 The Suttle Projects Ltd Board is committed to ensuring that there is no modern-day slavery or human trafficking in our supply chains or in any part of our business. Our Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

1.2 This policy seeks continuous improvement and compliance with legislation. The Company will achieve these aims by our initiative to identify and mitigate risk in the following ways (But not limited to):

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.).
- Continually audit & review our practices for checking all employees are paid at least the minimum / living wage and have the right to work;
- We encourage the reporting of concerns and the protection of whistle blowers.
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

1.3 The Board and the Managing Directors are tasked to ensure that they measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains by:

- Completion of Audits by Directors, Managers, Safety Managers and Safety Advisors;
- Use of labour monitoring and payroll systems;
- Level of communication and personal contact with the supply chain and their understanding of, and compliance with, our expectations.

2. Legislation and Codes of Practice

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement. We will continually monitor this policy to ensure we are compliant with the requirements of relevant underpinning legislation; however, our aim is to exceed the requirements of legislation wherever possible.

Signed:

A handwritten signature in dark ink, appearing to read 'J Paine', with a stylized flourish at the end.

J Paine, Managing Director

Dated: 19th January 2025

Date of next review: Jan 2026

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