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Revision History

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INTRODUCTION

At End Systems, we recognise that Modern Slavery is a crime and a violation of fundamental human rights. We are aware that Modern Slavery takes various forms, as detailed in the definitions section of this document, all of which have in common the deprivation of a person's liberty by another person in order to exploit them for personal or commercial gain.

Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. We operate a zero policy towards any company or individual (employee or otherwise) who is found to be active in deprivation of liberty towards another person or persons.

ORGANISATION STRUCTURE

End Systems is a private limited company registered in the UK in June 1976. We operate in the construction industry and offer services which include Commissioning Management, Commissioning & Testing, Validation, Water Treatment and Documentation for Buildings and Building Services.

We hire the services of sub contractors to provide additional services or assist with our suite of services.

DEFINITIONS

End Systems considers that modern slavery encompasses the following:

Slavery, Servitude, Forced or Compulsory Labour

A person is a victim of this type of behaviour when: -

- A person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
- A person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.
- Examples of this type of behaviour include but is not limited to: -
- Forced work through mental or physical threat
- Being owned or controlled by an employer or person through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or have restriction placed on freedom of movement.

Human Trafficking

A person commits an offence if: -

- The person arranges or facilitates the travel of another person with a view to the 'other person' being exploited. It is irrelevant if the 'other person' consents to the travel.
- It is irrelevant whether the 'other person' is an adult or a child.
- Arranging or facilitating the 'other persons' travel may include: -
- Travel by recruitment
- Transporting or transferring
- Harboursing or receiving
- Transferring or exchanging control of the 'other person'

Arranging or facilitating the 'other persons' travel is considered exploitation if the person intends to exploit the 'other person' during or after the travel, or the person knows or ought to know the 'other person' is likely to be exploited by a third party during or after the travel.

Travel means arriving in, or entering any country, departing from any country, or travelling within a country.

Any UK national commits an offence regardless of where the arranging or facilitating takes place or where the travel takes place.

Any non-UK national commits an offence if any part of the arranging or facilitating takes place in the UK or the travel consists of arrival in or entry into, departure from, or travel within the UK.

COMMITMENT

End Systems as an organisation does not have a turnover in excess of thirty-six million pounds, therefore, there is no legal requirement to publish a modern slavery policy or statement. However, as a conscientious employer we have taken the decision to produce a policy which aims to raise awareness of modern slavery within the company and ensure that this is cascaded to any person or contractors working on our behalf.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK.

We expect all persons or sub-contractors working on our behalf to hold the same principles and follow our lead in preventing modern slavery in the workplace.

SUB-CONTRACTORS

In order to fulfil our workload, we hire the services of sub contractors, and it should be noted that we will check their compliance with modern slavery law and assist with policy to ensure there is continuity between the two.

RISK & COMPLIANCE

End Systems consider the overall risk of exposure to slavery/human trafficking to extremely low, however, we have introduced this policy to ensure that such practices do not take place within the organisation and that any contractors who may work on our behalf follow the high standards expected by our own practices.

All our employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

All employees must notify your line manager OR a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

All employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business, including suppliers and sub contractors at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must report it to your line manager or company Director as soon as possible and be assured that it will be actioned and treated with utmost confidentiality.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any supplier or sub contractor constitutes any of the various forms of modern slavery detailed within the definitions section of this document, you should raise it with your line manager or company Director.

RISK & COMPLIANCE (Continued)

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our suppliers or sub contractors.

Detrimental treatment as stated above includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the policies and procedures section of the Company Intranet.


TRAINING

We will provide our employees with the necessary training to allow compliance with this policy and instil a no blame culture to promote the reporting of any incidents or perceived incidents related to this policy.

BREACHES OF THIS POLICY

Any employee who is found to have breached this policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct.

We will terminate relationships with any individuals or companies working on our behalf who are found to have breached this policy.

Signed: 
M. Corlett
Managing Director for and on behalf of End Systems Limited
Date: <u>15th January 2026</u>