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Revision History

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Contents

SECTION 1 - INTRODUCTION	3
SECTION 2 - ORGANISATION STRUCTURE.....	3
SECTION 3 - DEFINITIONS.....	3
SECTION 4 - COMMITMENT	4
4.1 – Responsibilities	5
SECTION 5 - SUB-CONTRACTORS	5
SECTION 6 - RISK & COMPLIANCE	5
6.1 - Reporting	6
6.2 - Whistleblowing	6
SECTION 7 - TRAINING	7
SECTION 8 - BREACHES OF THIS POLICY	7
SECTION 9 – POLICY REVIEW	7

SECTION 1 - 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-tolerance approach towards any company, supplier, subcontractor or individual found to be involved in modern slavery, forced labour, servitude or human trafficking.

SECTION 2 - 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.

SECTION 3 - DEFINITIONS

End Systems considers that modern slavery encompasses the following:

3.1 - 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.

3.2 - 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
- Harbours 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.

SECTION 4 - COMMITMENT

End Systems reviews its obligations under applicable modern slavery legislation on an ongoing basis. Regardless of any statutory reporting requirements, we are committed to preventing modern slavery and human trafficking in our operations and supply chain.

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.

4.1 – Responsibilities

The Managing Director has overall responsibility for ensuring compliance with this policy.

Managers are responsible for ensuring employees understand and comply with the requirements of this policy.

All employees, subcontractors and suppliers are expected to identify and report any concerns relating to modern slavery.

SECTION 5 - SUB-CONTRACTORS

End Systems expects all subcontractors, suppliers and labour providers to operate to the same high standards as our organisation.

Prior to engagement, we may undertake reasonable due diligence checks, including verification of legal status, right-to-work processes, and confirmation that appropriate policies and procedures are in place.

Where concerns are identified, End Systems reserves the right to seek further information, require corrective actions, or terminate business relationships where appropriate.

SECTION 6 - 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.

End Systems periodically reviews the risk of modern slavery within its operations and supply chain. Particular consideration is given to:

- Use of subcontracted labour
- Temporary labour providers
- Recruitment practices
- Supply chain arrangements
- Work undertaken in higher-risk sectors or locations

Findings from risk assessments will be reviewed by management and appropriate actions implemented where required.

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.

6.1 - Reporting

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.

6.2 - Whistleblowing

Employees may report concerns through their Line Manager, Director, or via the Company's Whistleblowing Policy, where appropriate. Reports made in good faith will be treated confidentially and without fear of retaliation

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.

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.

SECTION 7 - TRAINING

End Systems will provide appropriate awareness training to employees regarding modern slavery risks and indicators.

Training will form part of employee induction and may be refreshed periodically where deemed necessary.

Employees involved in recruitment, procurement and subcontractor management may receive additional training relevant to their responsibilities.

SECTION 8 - 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.

Any substantiated concerns regarding suppliers, subcontractors or labour providers may result in corrective action plans, suspension of services or termination of contractual arrangements.

SECTION 9 – POLICY REVIEW

This policy will be reviewed annually, or sooner if required by changes in legislation, organisational structure, business activities or identified risks.

Responsibility for reviewing this policy rests with the Managing Director.

Signed:  _____ M. Corlett Managing Director for and on behalf of End Systems Limited Date: <u>5th August 2026</u>
