

Lowry Building & Civil Engineering Ltd

Modern Slavery Policy

Policy Statement

This statement is made in conformance with the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that slavery and human trafficking is not taking place in our business or any part of our supply chain. Modern slavery is the term used to encompass slavery, forced and compulsory labour and human trafficking of all ages.

Lowry Building & Civil Engineering Ltd operates as a building and civil engineering contractor with a structured management team, directly employed workforce, and an established supply chain consisting of subcontractors, labour providers, consultants, and material suppliers. Our operations primarily cover construction and civil engineering projects across the UK and Ireland. Our supply chains include procurement of materials, plant, equipment, and subcontracted labour, and we recognise that these areas may present varying levels of risk.

Modern slavery is an international crime affecting many individuals around the world. This global issue transcends age, gender and ethnicities; it is estimated that 1 in 4 victims of modern slavery are children and that 3 quarters are women and girls.

“Modern slavery” refers to the offences of human trafficking, slavery, servitude, and forced or compulsory labour. This can then be considered under five headings:

- the sexual exploitation of adults
- the trafficking of adults into conditions of labour exploitation
- the trafficking of adults into conditions of criminal exploitation
- the trafficking of minors into conditions of sexual, criminal or labour exploitation
- other forms of exploitation.

“Human trafficking” is a global crime that trades in people and exploits them for profit. “Human trafficking” is defined in the UN Trafficking in Persons Protocol, which supplements the United Nations Convention against Transnational Organized Crime, as “the recruitment, transport, transfer, harbouring or receipt of a person by such means as threat or use of force or other forms of coercion, abduction, fraud or deception for the purpose of exploitation”. Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country. There are several broad categories of exploitation linked to human trafficking, including sexual exploitation, forced labour, domestic servitude, organ harvesting, child related crimes, forced marriage and illegal adoption.

Modern slavery includes victims who have been brought from overseas and vulnerable people in the UK, Isle of Man and in Ireland who are forced to work illegally against their will. This is across many different sectors such as agriculture, hospitality (catering, etc.), construction, car wash services, retail and manufacturing (though COVID related restrictions may have seen some re-distribution to food supply chains and warehousing).

The policy of Lowry Building & Civil Engineering is to conduct all of our business in an honest and ethical manner, and to comply with all applicable legislation. We strive to ensure that neither modern slavery nor human trafficking supports our supply chain or our direct business; this objective is implicit in our policies and procedures. We aim for a zero-tolerance approach to violations of anti-slavery and human trafficking laws.

Our policies in relation to slavery and human trafficking include this Modern Slavery Policy, our recruitment procedures, supply chain pre-qualification requirements, and our commitment to ethical business conduct. These policies collectively set expectations for our employees, subcontractors, and suppliers.

If breaches of these laws are found within our supply chain, we will look to support organisations in their efforts to comply with the applicable legislation.

Our recruitment processes are transparent and reviewed regularly. New employees are vetted to ensure that we are able to confirm their identities and that they are paid directly into an appropriate, personal bank account.

Where appropriate we require our supply chain to be either registered with Constructionline, or have completed our pre-qualification process. These require our supply chain to demonstrate the steps taken to ensure that slavery and human trafficking is not taking place in any part of their business.

As part of our due diligence processes, we assess suppliers and subcontractors during onboarding and periodically thereafter. This includes reviewing their policies, accreditations, and evidence of compliance. We recognise that certain parts of our supply chain, particularly labour provision, raw material sourcing, and subcontracted works may present higher risks. We take steps to assess and manage these risks through pre-qualification checks, ongoing monitoring, and engagement with suppliers to ensure continuous improvement.

To measure our effectiveness in preventing modern slavery, we monitor indicators such as:

- completion of supplier pre-qualification checks;
- the number of staff trained;
- the frequency of policy reviews;
- any reported concerns and the actions taken;

- compliance levels within our supply chain.

This policy and its operation in practice will be reviewed on an annual basis.

Reporting knowledge or suspicion of slavery or human trafficking

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject. Training and capacity building are made available to employees to ensure they can identify signs of exploitation and understand reporting procedures.

All employees and partners within the company have a statutory obligation to report knowledge or suspicion of slavery or human trafficking. Any genuine suspicion or knowledge of slavery or human trafficking is to be immediately reported to the relevant management personnel, who will decide what further action, if any, is deemed necessary.

Partners and employees who raise concerns of slavery or human trafficking in good faith may do so without fear of discrimination or reprisal.

These provisions do not replace any legal reporting or disclosure requirements. Where statutory reporting requirements and procedures exist, these must be fully complied with.

Director’s Signature: *Helen Lowry*.....

Date of issue of this MS Policy:	May 2026	Issue Number:	7
----------------------------------	----------	---------------	---