

Modern Slavery and Human Trafficking Policy

This statement sets out the steps Thornwood Design & Build has undertaken and is continuing to take to ensure modern slavery or human trafficking is not taking place within our business or supply chain.

Thornwood Design & Build has a zero-tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings.

We are committed to creating effective systems and controls to safeguard against modern slavery within the business or our supply chain. We impose those same high standards on our contractors, suppliers, and other business partners.

1. Organisation Structure, Business, and Supply Chains

Thornwood Design & Build Ltd is a main contractor based in Essex, delivering construction services across London and the Home Counties. We operate in a range of sectors including education, healthcare, residential, commercial fit-outs, and specialist environments. Projects range from small-scale and reactive works to multimillion-pound contracts in many different industries. Our supply chain includes architects, surveyors, subcontractors, labour providers, consultants, and material suppliers both in the UK and overseas.

2. Policy Statement

Thornwood Design & Build Ltd maintains a **zero-tolerance approach** to modern slavery and human trafficking. We are committed to ensuring transparency and ethical practices throughout our operations and supply chains. This policy sets out the steps we take to ensure slavery and human trafficking are not taking place in any part of our business or those we work with.

3. Policies in Relation to Slavery and Human Trafficking

We have implemented the following internal policies and procedures:

- **Anti-Slavery & Human Trafficking Policy**
- **Whistleblowing Policy** – includes protection for whistleblowers raising concerns about modern slavery.
- **Recruitment Policy** – ensures fair hiring practices and that all employment is voluntary.
- **Supplier Code of Conduct** – outlines expectations that suppliers do not engage in forced or trafficked labour.

These policies are available to all staff, partners, and suppliers upon request.

4. Due Diligence Processes

To mitigate risks, Thornwood Design & Build Ltd takes the following actions:

- Vetting new suppliers and subcontractors for compliance with modern slavery legislation.
 - Including anti-slavery clauses in all contracts.
 - Requesting suppliers to confirm their compliance with the Modern Slavery Act 2015.
 - Reserving the right to audit any supplier or subcontractor where concerns are raised.
 - Conducting regular supplier reviews and obtaining self-assessment questionnaires for ongoing risk management.
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5. Risk Assessment and Management

We recognise that some areas of our supply chain—particularly subcontracted labour, temporary staffing agencies, and overseas material providers—pose higher risks. To assess and manage these risks, we:

- Conduct annual risk assessments across all supply categories.
 - Focus our due diligence efforts on high-risk categories and geographies.
 - Require tier 1 suppliers to conduct their own risk assessments and cascade standards down their supply chains.
 - Monitor indicators of unethical labour practices including unexplained pricing anomalies or lack of documentation.
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6. Measuring Effectiveness

We assess the effectiveness of our anti-slavery measures using the following performance indicators:

- Percentage of suppliers that have signed our Modern Slavery Declaration.
 - Number of staff trained on modern slavery awareness.
 - Number of whistleblowing reports related to modern slavery (target: zero).
 - Frequency of supplier audits or compliance reviews.
 - Response time to any raised concern or reported risk.
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7. Training and Capacity Building

We ensure that relevant staff, particularly those involved in procurement, HR, and site management, are trained to:

- Identify signs of modern slavery or human trafficking.
- Understand reporting channels and procedures.
- Conduct ethical procurement and supplier evaluation.

Training is refreshed annually and forms part of our induction for new employees.

8. Reporting Concerns

Employees are encouraged to report concerns regarding slavery or human trafficking via:

- Line managers or senior leadership.
- HR department.
- Confidential whistleblowing channels.
- Modern Slavery Helpline (0800 0121 700).

All reports will be taken seriously and handled confidentially. Retaliation against whistleblowers is strictly prohibited.

9. Continuous Improvement and Review

This policy is reviewed annually by the Board of Directors to ensure relevance and compliance. It informs our annual Modern Slavery Statement, which is published on our company website.

Signed: Thomas Burton

Date: 1st April 2025



Position: Founder & Managing Director