



The DE Group Modern Slavery and Human Trafficking Policy

Modern Slavery is a term which encompasses slavery, servitude and forced or compulsory labour. Human trafficking is defined as arranging or facilitating the travel of another person with a view to that person being exploited.

Thus depriving the individual's freedom and basic human rights, all for the purpose of financial or personal gain.

Our Commitment

The DE Group (Deconstruct (UK) Ltd, DE Group Contracting Ltd, Derisk (UK) Ltd and DE-Construction Services) are committed to ensuring total transparency in our business and the ways in which we aim to tackle modern slavery throughout our supply chains which are in strict accordance with The Modern Slavery Act 2015.

The DE Group apply strict zero tolerance policy to any forms of slavery and human trafficking involved in any part of our business or its external supply chains. We require our supply chain to commit to compliance with this Statement & Policy.

Examples of Modern Slavery exploitation include:

- *Forced labor.*
- *Child labor.*
- *Withholding identity and migration documentation.*
- *Using recruiter who are not compliant with local labor and recruiting requirements.*
- *Unfair and illegal charging of fees.*
- *The procurement of commercial sex acts.*

The DE Group prohibits and does not support these activities within its supply chain and business activities.

All agencies used must be a member of REC (Recruitment and Employment Confederation).

The DE Group are committed to paying, as a minimum standard, the relevant minimum or living wage for the area in which the recruitment has taken place.

Scope of the Business

The provision of construction site enablement services comprising of demolition, façade retention, site clearance, soft strip demolition, structural alteration, asbestos removal, temporary works, builders work, permanent steel frames, concrete work, piling, underpinning, drainage, and excavation. The provision of Health & Safety consultancy and supply of trained and competent labour resources including to the rail industries.

Overview of Current Business Structure

Office Location London and Dartford

Main Areas of Operation United Kingdom

Due Diligence

The DE Group policies, processes and procedures currently in place that support the prevention of Modern Slavery and Human Trafficking

- *Risk management processes*
- *Whistleblowing & grievance procedure*
- *Equality & Diversity policy*
- *Bullying and harassment*
- *Training policy*
- *Corporate Social Responsibility (CSR) Statement*
- *Procurement process*
- *Responsible procurement*

Compliance

All employees or those working on behalf the DE Group, have full access to this policy within our internal I.T. systems, from their line manager, HR or Group Quality & Environmental Manager. The statement is also published on the organisation's website. www.degrouk.com

The DE Group will continue to educate those working for us on the risks of modern slavery and human trafficking in the workplace and how it is still prevalent around the world and that we need to work together to stop this inhumane practice. This will be through raising employee awareness at induction or during the annual policy review to all relevant employees to assist them in being able to identify possible risks or personnel who may be at risk.

All workers engaged by The DE Group will undergo internal verification checks to ensure their right to work status and validity of provided identity and migration documentation. This will be completed prior to commencement of contract.

Controls

If you suspect or have evidence to suggest that an act of slavery is being committed, either within the company or from an external supplier, your manager or HR Department must be informed immediately in line with our whistleblowing policy.

All concerns raised will be taken seriously and any information will be treated in the strictest confidence. False allegations intended in a malicious fashion to cause harm to an individual or a company's reputation will not be tolerated under any circumstances; disciplinary action will be taken against the individual which may result in dismissal.

If anyone working on behalf The DE Group is discovered to be intentionally involved in modern slavery activities a full investigation will take place by the Systems and Standards Director. Pending results of this investigation the contract between us and the individual(s) may be terminated with instant effect and appropriate authorities will be contacted.

Performance and Actions Taken this period:

The following items form the basis of our internal KPI's which the DE Group will monitor monthly through all feedback channels and audits both internally and externally. These are submitted to the board meetings.

As a business, we are more than willing to amend or include further items as requested by interested 3rd parties.

- *Modern Slavery employee's awareness.*
- *Incidents identified of Modern Slavery.*
- *Incidents identified of Human Trafficking.*
- *Percentage of external providers which have been approved/subject to ongoing monitoring.*
- *External provider (supplier/sub-contractor) non-compliance identified.*
- *Policy remains suitable and has been reviewed (updated as necessary).*
- *Number of staff checked for eligibility and right to work within the U.K.*
- *Complaints raised against the business(s) in relation to Modern Slavery or Human Trafficking.*

Authorisation & Policy Review

The Group SHEQ Director is responsible for the contents of this Policy, which will be reviewed and updated as necessary on at least an annual basis.

Signed for, and on behalf of, The DE Group Board



Marc Smith
Group SHEQ Director
23rd January 2025

To be reviewed by 25th June 2024