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## MODERN SLAVERY POLICY

FORM NO: HRPOL - 18  
VERSION: 3  
REVIEWED: MAY 26

### 1. Policy Statement

Muir is committed to conducting its business lawfully, ethically and responsibly. We take a zero-tolerance approach to modern slavery, human trafficking, forced labour, servitude, child labour and labour exploitation in any part of our business or supply chain.

This policy supports our commitment to act with integrity in our relationships with employees, workers, clients, consultants, suppliers, subcontractors, labour providers and other business partners. We recognise that construction can present heightened modern slavery risk due to complex supply chains, labour-only subcontracting, agency labour, migrant labour, short-term project demands and pressure on cost and programme.

We will not knowingly support, tolerate or benefit from modern slavery or labour exploitation. Where concerns are identified, our response will prioritise the safety, welfare and rights of potential victims. We will act promptly, involve the appropriate authorities where required, and avoid action that could place a potential victim at further risk.

Where Muir is legally required to publish a modern slavery and human trafficking statement under section 54 of the Modern Slavery Act 2015, or where the Board decides that publication is appropriate as a matter of good governance, the statement will be approved and signed at the appropriate level and reviewed annually.

J W Muir  
Chairman  
Date: May 2026

### 2. Who is covered by this policy?

This policy applies to all individuals working at all levels and grades, including directors, senior managers, employees, workers, trainees, apprentices, agency workers, temporary workers, consultants, contractors, subcontractors, labour-only subcontractors, suppliers, service providers and any other person or organisation working for us, with us, or on our behalf.

It also applies to all Muir sites, offices, projects and business activities, including pre-construction, procurement, tendering, site operations, aftercare and support functions.

### 3. Purpose of this policy

The purpose of this policy is to:

- set out Muir's position on modern slavery and labour exploitation;
- explain the responsibilities of those working for or with Muir;
- help workers recognise signs of modern slavery and labour exploitation;
- set minimum expectations for recruitment, labour provision, subcontracting and supply chain management;
- provide a clear route for raising concerns; and
- support compliance with the Modern Slavery Act 2015, wider UK employment law, procurement expectations and recognised construction industry good practice.

### 4. What is modern slavery?

Modern slavery is a serious crime and an abuse of human rights. It includes situations where a person is exploited and cannot refuse or leave because of threats, violence, coercion, deception, abuse of power, debt, control of documents, isolation or other forms of pressure.

Modern slavery can include:

- slavery, servitude and forced or compulsory labour;
- human trafficking, including recruitment, transport, transfer, harbouring or receipt of people for exploitation;
- labour exploitation, including workers being forced to work excessive hours, for little or no pay, or under threats or control;
- debt bondage, including recruitment fees, illegal deductions, accommodation charges or transport costs used to trap workers;
- withholding of passports, identity documents, bank cards or wages;
- child labour, particularly where it is illegal, unsafe or exploitative; and
- any arrangement where a person is controlled, threatened or deceived for another person's gain.

Modern slavery may not be obvious. It may look like ordinary work unless managers, supervisors, workers and supply chain partners are alert to the signs.

## **5. Legal and regulatory framework**

This policy is prepared with reference to the Modern Slavery Act 2015, which consolidates offences relating to slavery, servitude, forced or compulsory labour and human trafficking. It also includes the transparency in supply chains requirements under section 54 for commercial organisations carrying on business in the UK, supplying goods or services, and meeting the statutory turnover threshold.

The policy also supports compliance with wider legal and governance expectations, including:

- UK employment and right to work requirements;
- health and safety duties to protect workers and others affected by our work;
- whistleblowing protections where workers raise qualifying protected disclosures;
- data protection requirements when handling personal or sensitive information;
- public and private sector procurement expectations relating to responsible supply chains; and
- client requirements relating to ethical labour, supply chain governance and responsible sourcing.

Nothing in this policy prevents any person from reporting a crime, raising a protected disclosure, contacting a regulator, seeking legal advice, contacting the police, or contacting a specialist support organisation.

## **6. Our business and supply chain risk**

We have identified that the following are particular modern slavery and labour exploitation risks for a construction business:

- use of multiple tiers of subcontractors, labour-only subcontractors and agencies;
- workers supplied through informal or unclear recruitment routes;
- false self-employment, illegal deduction of wages, unpaid wages or unexplained wage arrangements;
- workers being charged recruitment fees, transport costs or accommodation costs that create debt;
- workers who appear controlled by another person, are reluctant to speak freely, or do not hold their own documents;
- use of migrant labour where workers may not understand their rights or may fear authorities;
- cost-led procurement, unusually low tender pricing or pressure to resource projects at short notice;
- suppliers unable or unwilling to provide clear evidence of employment, payroll, right to work, training, competence or insurance arrangements;
- high-risk goods, materials or manufactured products from jurisdictions or sectors associated with forced labour; and
- accommodation or transport arrangements that appear to be controlled by an employer, labour provider or gangmaster.

These risks do not mean that wrongdoing has occurred. They are warning signs that require proportionate checking, escalation and, where necessary, investigation.

### 7. What is not acceptable

It is not acceptable for any person working for or with Muir to:

- use, tolerate, conceal or benefit from modern slavery, forced labour, trafficking, servitude, child labour or labour exploitation;
- use any labour provider, agency, subcontractor or supplier without appropriate approval, checks and contractual controls;
- ignore concerns because the worker is employed by another company or is lower down the supply chain;
- allow any person to work on a Muir site where there are credible concerns that they are being controlled, coerced, trafficked, exploited or placed at risk;
- confiscate or hold passports, visas, identity documents, bank cards or personal documents, except where strictly required for a lawful and temporary verification process and returned immediately;
- charge workers recruitment fees or require workers to repay improper fees, deposits, accommodation charges, transport costs or other deductions that are not lawful and transparent;
- pay workers through another person's bank account where there is no clear lawful explanation;
- threaten, dismiss, penalise or disadvantage anyone who raises a genuine concern; or
- provide false records or conceal information relating to labour, wages, right to work, recruitment routes or working conditions.

### 8. Your responsibilities

All workers must read, understand and comply with this policy. Everyone has a responsibility to remain alert to modern slavery and labour exploitation risks and to report concerns promptly.

Managers and supervisors must ensure that workers under their control understand the basic signs of labour exploitation, know how to raise concerns, and are not discouraged from speaking up. Site teams must not assume that labour exploitation is only a head office, procurement or HR matter.

Any person who knowingly breaches this policy, conceals a concern, victimises a person who raises a concern, or knowingly uses exploited labour may face disciplinary action, which may include dismissal for gross misconduct. Muir may also terminate commercial relationships with suppliers, subcontractors or labour providers who breach this policy or fail to take reasonable corrective action.

## 9. Supply chain due diligence and procurement controls

Muir will take proportionate steps to reduce modern slavery risk within procurement and supply chain management. The level of checking will depend on the nature of the works, the value and duration of the contract, the labour model, country or sector risk, previous performance and any warning signs identified.

Controls may include, as appropriate:

- pre-qualification checks for suppliers, subcontractors and labour providers;
- contractual clauses requiring compliance with the Modern Slavery Act 2015 and this policy;
- checks on right to work, employment status, payroll arrangements, labour supply chains and use of further subcontracting;
- requirements for suppliers and subcontractors to cascade equivalent standards to their own supply chains;
- requirements to notify Muir of any suspected or confirmed modern slavery concern connected to our work;
- review of unusually low tenders, abnormal labour rates or unclear resource proposals;
- checks on high-risk materials, products, manufacturers, labour sources or recruitment routes;
- periodic supplier reviews, audits or requests for evidence where risk justifies it; and
- corrective action plans where weaknesses are identified.

Discovery of a modern slavery risk will not automatically result in termination of a contract where doing so could harm a potential victim. Muir will consider the facts, take advice where required, and act in a way that protects workers and supports lawful remediation.

## 10. Recruitment, employment and labour standards

Muir expects all workers in its business and supply chain to be recruited and treated lawfully, fairly and safely. Recruitment and labour arrangements must be transparent and capable of audit.

The following minimum standards apply:

- workers must have a written contract or clear written terms appropriate to their role;
- workers must not be charged recruitment fees to obtain work;
- workers must be paid lawfully, on time and through legitimate payroll arrangements;
- workers must retain control of their own identity documents, bank account and personal possessions;
- workers must have lawful right to work checks undertaken by their employer or labour provider;
- working hours, rest breaks, holidays, sick pay and other statutory rights must be managed lawfully;
- accommodation and transport arrangements must not be used to control, exploit or indebt workers;
- workers must be free to leave employment subject to lawful notice provisions; and
- workers must be able to raise concerns without fear of punishment or retaliation.

### **11. Site management controls**

Construction sites can provide important opportunities to detect concerns. Site managers, project managers, supervisors and those carrying out inductions should remain alert to practical warning signs.

Site controls may include:

- checking that workers attending site are employed or engaged through an approved contractor, subcontractor, agency or labour provider;
- ensuring site induction is understood, including how to report concerns confidentially;
- observing whether workers appear frightened, controlled, withdrawn, confused or unable to speak for themselves;
- checking whether several workers provide the same address, same emergency contact, same bank account details or are transported by the same controlling person;
- querying unexplained changes in labour, attendance, supervision or worker identification;
- escalating concerns to HR, the project lead or senior management as appropriate;
- not confronting suspected traffickers or controllers where this could place a worker at risk; and
- calling 999 immediately where a person appears to be in immediate danger.

### **12. Reporting concerns and suspected incidents**

You are encouraged to raise concerns at the earliest possible stage. You do not need proof that modern slavery is occurring. If something does not feel right, report it.

Concerns may be reported to:

- your Line Manager;
- the Site Manager or Project Manager;
- Human Resources;
- a Director; or
- through the Whistleblowing Policy where applicable.

If a person may be in immediate danger, call 999. If a crime is suspected but there is no immediate danger, contact the police on 101. Concerns about labour exploitation may also be reported to the Gangmasters and Labour Abuse Authority. Advice can also be obtained from specialist modern slavery support services, including the Modern Slavery and Exploitation Helpline.

Do not investigate alone, make promises to potential victims, confront suspected perpetrators, or take action that may increase risk. Preserve relevant information and escalate promptly.

### **13. Protection**

Muir will support anyone who raises a genuine concern in good faith, even if the concern later turns out to be mistaken. No worker should suffer detrimental treatment because they refused to participate in modern slavery or labour exploitation, raised a concern, assisted an investigation or cooperated with a lawful authority.

Detrimental treatment includes dismissal, disciplinary action, threats, bullying, reduced work opportunities, poor treatment or any other unfavourable treatment connected with raising a concern. Anyone who believes they have suffered such treatment should inform HR, or a Director immediately. Employees may also use the Grievance Procedure.

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#### 14. Training and communication

Training and communication on this policy will be proportionate to role and risk. Modern slavery awareness will form part of relevant induction, procurement, HR, site management and supply chain communications.

Those involved in procurement, commercial management, HR, site management, project delivery, labour engagement, subcontractor management and supplier approval should receive information appropriate to their role. Communication to suppliers and subcontractors should make clear that compliance with this policy is a condition of working with Muir.

#### 15. Record keeping and modern slavery statement

Muir will maintain records proportionate to risk, including supplier checks, procurement decisions, contractual controls, reported concerns, investigation outcomes, corrective actions, training records and policy review records.

Where a modern slavery statement is required or published, it should accurately describe the steps taken during the financial year to identify, prevent, mitigate and address modern slavery risks in the business and supply chain. It should not claim that the business or supply chain is slavery free unless this can be properly evidenced.

Where required under section 54 of the Modern Slavery Act 2015, the statement must be approved by the Board, signed by a director or equivalent, published on the organisation's website and linked in a prominent place. Good practice is to publish it within six months of the financial year end and retain previous statements to demonstrate progress.

#### 16. Who is responsible for this policy?

The Board of Directors has overall responsibility for this policy and for ensuring that Muir takes appropriate steps to prevent, identify and respond to modern slavery risks in its business and supply chain.

The HR Manager or as delegated has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and dealing with questions on interpretation. HR, Procurement, Commercial, Project Management, Site Management and relevant department heads are responsible for applying the policy within their areas of control.

Managers at all levels are responsible for ensuring that those reporting to them are made aware of this policy and understand how to raise concerns.

#### 17. Monitoring and review

This policy will be reviewed at least annually, or sooner where there are material changes in legislation, government guidance, business activity, supply chain risk, client requirements, incidents, audit findings or lessons learned.

Monitoring may include review of supplier approval records, subcontractor compliance, labour provider checks, incident and concern reports, training completion, audit findings, modern slavery statement content and corrective action closure.

### Appendix 1 - Potential risk scenarios: red flags

The following are examples of warning signs. They do not prove modern slavery, but they should prompt questions, checks and escalation.

- A supplier, subcontractor or labour provider offers labour at rates that appear too low to support lawful pay, tax, insurance, supervision, training and welfare costs.
- A worker appears frightened, withdrawn, anxious, malnourished, injured, exhausted, confused or reluctant to speak.
- A worker is always accompanied by another person who speaks for them, controls their movements or answers questions on their behalf.
- A worker does not hold their own passport, visa, identity documents, bank card, phone or personal possessions.
- Several workers give the same home address, same emergency contact, same telephone number or same bank account details.
- Workers are dropped off and collected at unusual times, by the same person, or appear unsure where they live.
- Workers appear to live in overcrowded, poor or controlled accommodation.
- Workers state or indicate that deductions are being made from wages for accommodation, transport, food, tools, PPE, training or recruitment fees in a way they do not understand.
- A worker is unable to explain who employs them, how they are paid, what rate they receive or who controls their work.
- A labour provider or subcontractor resists providing evidence of right to work checks, employment terms, payroll records, insurance, competence or supervision arrangements.
- A contractor uses further subcontracting or agency labour that has not been declared or approved.
- A worker appears underage, or there is uncertainty about age or identity.
- A worker is afraid of authorities, police, tax officials, immigration officials or site management.
- There are unexplained injuries, untreated medical conditions, fatigue or signs that workers are not able to access healthcare.
- Someone offers to provide immediate labour at short notice but cannot clearly explain recruitment routes, employment arrangements or rates of pay.
- There is pressure to ignore normal onboarding, induction, identity, competence, right to work or supply chain checks.

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### Appendix 2 - Reporting route and emergency action

If you are concerned that someone may be a victim of modern slavery or labour exploitation:

- If there is immediate danger, call 999.
- If a crime is suspected but there is no immediate danger, contact the police on 101.
- Report the concern internally to your Line Manager, Site Manager, Project Manager, HR, or a Director.
- Use the Whistleblowing Policy if you prefer to raise the matter through that route.
- Do not confront any suspected trafficker, controller, labour provider or subcontractor in a way that may place the worker at greater risk.
- Do not promise confidentiality that could prevent lawful safeguarding or reporting action.
- Make a factual note of what was seen, said, heard or reported, including dates, times, names, company names, locations and any documents or vehicles involved.
- Preserve relevant records and do not alter or destroy evidence.
- Where specialist advice is needed, contact the appropriate authority or support organisation before taking action.

External contacts that may be relevant include the police, the Gangmasters and Labour Abuse Authority, the Modern Slavery and Exploitation Helpline and local safeguarding services. Internal advice should be sought urgently where the correct reporting route is unclear.

### Appendix 3 - Legal and guidance basis used

This policy has been prepared with reference to the following legal and guidance sources. The list is included to support review and maintenance of the policy and should be checked at each review cycle:

- Modern Slavery Act 2015, including offences of slavery, servitude, forced or compulsory labour and human trafficking, and section 54 transparency in supply chains requirements.
- Home Office / GOV.UK Transparency in supply chains statutory guidance and practical guidance on modern slavery statements.
- GOV.UK guidance on publishing an annual modern slavery statement, including annual review, board approval, sign off and website publication expectations.
- GOV.UK Procurement Policy Note 009 guidance on tackling modern slavery in government supply chains, including remediation and victim-centred response expectations.
- UK Government modern slavery briefing for the construction industry, including construction-specific warning signs and recommended checks.
- CIOB policy position and construction industry guidance on modern slavery risk, fragmented supply chains, procurement and subcontractor control.
- Public Interest Disclosure Act 1998 and wider whistleblowing principles, where concerns may amount to protected disclosures.
- UK GDPR and Data Protection Act 2018 requirements where personal data, special category data or information about potential victims is recorded or shared.