MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Amber Construction Services Ltd has taken to prevent modern slavery and human trafficking within its business operations and supply chains.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking; all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Amber Construction Services Ltd has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere within our own business or in any of our supply chains.

We are committed to ensuring that there is transparency in our own business and in our approach to modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. This includes the following provisions:

- Adherence to local and national laws
- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association
- Prohibits any threat of violence, harassment and intimidation
- Prohibits the use of worker-paid recruitment fees
- Prohibits compulsory overtime
- Prohibits child labour
- Prohibits discrimination
- Prohibits confiscation of workers original identification documents
- Provides access to remedy, compensation and justice for victims of modern slavery

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting process, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standard.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners.

Due Diligence Processes

Amber Construction Services Ltd undertakes due diligence measures to minimise the risk of modern slavery and human trafficking within its operations and supply chains.

These measures include:

- Verification of employee identity through original documentation and recognised third-party identity checking providers.
- Completion of right-to-work checks for all employees prior to employment commencing.
- Verification of visas, share codes and immigration status where applicable.
- Retention of right-to-work documentation in accordance with legal requirements.
- Supplier and subcontractor pre-qualification assessments.
- Review of supplier competency, compliance and business practices before engagement.
- Ongoing monitoring of approved suppliers and subcontractors.
- Investigation of any concerns raised regarding unethical employment practices.

Where any uncertainty exists regarding an individual's right to work status, advice is obtained from the Company's HR consultancy and, where appropriate, relevant government guidance is followed before engagement proceeds.

We are committed to providing our staff with a salary which at least meets the National Living Wage and offering the required statutory leave entitlement. The former is audited monthly through the payroll process and procedures and the latter by independent review of the employment contract and related documentation coupled with the payroll audit. Furthermore, we ensure all our staff have provided their National Insurance Number, and Working Visa if applicable, prior to their employment and perform the necessary checks to determine their eligibility to work in the UK.

The construction industry attracts a workforce from all backgrounds. In the UK, we can utilise the skills of employees from across the world, particularly Europe. Whilst the benefit of this influx of workers allows for a competitive market, it also has the risk of potential exploitation. By checking our employees' NI Numbers or Working Visa's we know that they are legally eligible to work in the UK and that their salary will be monitored by HMRC.

Ensuring Standards in Our Supply Chain

Amber Construction Services Ltd requires of all our suppliers and sub-contractors compliance with our online pre-qualification system. This is being adapted to incorporate sufficient information to ensure that we are confident that our supply chain upholds the same standards, principals and business ethics that we do. Any new contracts entered into for suppliers outside of this system will be similarly vetted and scrutinised. Contracts will not be entered into or renewed if we feel the supplier does not reach our standards or has progressively allowed their standards to lower. Should you require any further information, please contact the company offices direct.

Suppliers and subcontractors are expected to:

- Comply with all applicable employment and immigration legislation.
- Ensure workers are employed voluntarily.
- Pay workers lawfully and fairly.
- Prevent forced, bonded or trafficked labour.
- Prohibit child labour.
- Permit workers to retain control of their own identity documents.
- Cooperate with any reasonable requests for information regarding labour standards and compliance.

Failure to meet these standards may result in suspension or termination of the business relationship.

Risk Assessment and Risk Management

Amber Construction Services Ltd recognises that certain aspects of the construction industry present a greater risk of modern slavery and labour exploitation.

Higher risk areas may include:

- Labour-only subcontractors.
- Temporary and agency workers.
- Lower-skilled labour sectors.
- Overseas supply chains for materials and products.
- Businesses with limited employment compliance arrangements.

To manage these risks the Company:

- Conducts right-to-work checks for all employees.
- Verifies identification and employment eligibility.
- Assesses suppliers and subcontractors through pre-qualification procedures.
- Monitors labour providers and subcontractors throughout engagement.
- Encourages reporting of concerns through management and whistleblowing channels.
- Reserves the right to suspend or terminate relationships with suppliers or subcontractors where concerns regarding labour standards arise.

Training and Awareness

Amber Construction Services Ltd promotes awareness of modern slavery risks throughout the organisation.

Training and awareness measures include:

- Induction processes covering legal and ethical employment requirements.
- Management awareness of modern slavery indicators and reporting procedures.
- Guidance for managers responsible for recruitment, procurement and subcontractor management.
- Communication of this statement and associated policies to relevant personnel.
- Periodic review of modern slavery risks as part of management system reviews.

Employees are encouraged to report concerns relating to labour exploitation, forced labour, human trafficking or unethical employment practices without fear of retaliation.

Signed: 

Dated: 25th April 2026
Bill Watts
Managing Director