HSEQ-020 – Modern Slavery Policy

Policy No	HSEQ-020	**Issue / Date**	Issue 2 – October 2026
Policy Owner	Mohammad (Mo) Akbari – Managing Director	**Next Review**	October 2027

1. Policy Statement

Modern slavery – including slavery, servitude, forced or compulsory labour, debt bondage, child labour and human trafficking – is a serious crime and a violation of fundamental human rights. UK Line Ltd conducts its business fairly, ethically and with respect for human rights. We have zero tolerance of modern slavery in our business and supply chains.

This policy applies to everyone who works for or on behalf of UK Line, including employees, directors, workers, agency staff, sub-contractors, consultants, suppliers and service providers. It does not form part of any contract of employment and may be amended at any time.

2. Responsibility

The Managing Director has overall responsibility for this policy. Chris Mulrooney is UK Line's Anti-Slavery Officer (ASO), responsible for implementing it, receiving reports and reporting to the Directors.

3. Preventing Modern Slavery in Our Business

- Right to work and identity checks are completed for everyone before work starts (HSEQ-032).
- Every employee receives a written statement of terms, and is paid at least the National Minimum / Living Wage directly into their own bank account.
- No worker is ever charged a recruitment fee, and UK Line never retains anyone's passport or identity documents.
- Working hours, rest breaks and holidays comply with the law. Workers are free to leave their employment with notice.
- Only reputable, licensed recruitment agencies and labour providers are used.
- Managers, supervisors and staff involved in recruitment and procurement are trained to recognise the signs of modern slavery.

4. Our Supply Chain

- Suppliers, labour providers and sub-contractors must comply with the Modern Slavery Act 2015, and confirm they have no modern slavery in their business or supply chains. Where required, they must provide their anti-slavery policy or statement.
- Contracts include anti-slavery obligations, and allow UK Line to audit and to end the contract if breaches are found.
- Higher-risk areas (e.g. labour supply, PPE, materials sourced overseas) receive additional due diligence.
- Where UK Line's turnover reaches the threshold in section 54 of the Modern Slavery Act 2015 (currently £36 million), an annual slavery and human trafficking statement will be approved by the board and published.

5. Recognising the Signs

Warning signs on sites and in labour gangs include workers who:

- do not hold their own ID documents, or whose pay goes to someone else;
- are transported to and from site by the same person, and appear controlled or afraid to speak;
- live in overcrowded accommodation provided by their 'employer', or owe a debt they cannot pay off;
- lack suitable clothing or PPE, appear malnourished, or work excessive hours.

6. Reporting Concerns

Anyone who suspects modern slavery in our business or supply chain must report it immediately to the ASO (Chris Mulrooney) or a Director. If someone is in immediate danger, call 999. Advice and anonymous reporting are available from the Modern Slavery & Exploitation Helpline on 08000 121 700. Do not confront suspected exploiters.

The ASO will investigate and report to the Directors, and refer cases to the police or other authorities as appropriate. No one will suffer detriment for reporting a genuine concern in good faith, even if it turns out to be mistaken.

7. Breaches and Review

Breaches of this policy may lead to disciplinary action, including dismissal, or termination of contracts with suppliers. This policy is communicated at induction; employees sign to confirm they have read it. It is reviewed at least annually.

8. Relevant Legislation and Standards

- Modern Slavery Act 2015 (incl. s.54 transparency in supply chains)
- Gangmasters (Licensing) Act 2004
- Immigration, Asylum and Nationality Act 2006
- National Minimum Wage Act 1998
- Working Time Regulations 1998

9. Approval

Signed		**Name**	**Mohammad (Mo) Akbari**
Position	Managing Director	**Date**	23 October 2026

Revision History			
Issue	**Date**	**Details of Change**	**Approved By**
1	17 August 2026	Previous issue.	Mohammad Akbari
2	October 2026	Updated with recruitment safeguards (no fees, no retaining ID, direct payment, right to work link), supply-chain due diligence, s.54 statement threshold, warning signs relevant to construction, and Modern Slavery & Exploitation Helpline (08000 121 700); formatting artefacts removed.	Mohammad Akbari