

Modern Slavery Statement - 2025

Deanway Construction Ltd are committed to high standards of ethical and governance arrangements in respect of impartiality, integrity and objectivity in managing our activities. We have a zero tolerance approach to modern slavery, and support the UK Government's objectives to eradicate modern slavery and human trafficking. We will work to positively influence policy; particularly around those areas of our supply chain where we recognise that there is may be any potential risk of modern slavery.

This is our first modern slavery statement. Over the next year, we will provide awareness training to all our colleagues on the Modern Slavery Act 2015 and make suitable resources available to enable them to take appropriate action if they suspect a case of slavery or human trafficking. We will also continue to do our own risk assessments and work with our suppliers in the higher risk categories to help them better understand the anti-slavery activity they should be undertaking. We are committed to maintaining best practice and to seeking continuous improvement.

2. Our commitments

We are committed to protecting and respecting human rights and have a zero tolerance approach towards modern slavery. We are committed to ensuring that there is no modern slavery and human trafficking in our supply chains or any part of our business. We do not enter into business with any organisation, which knowingly supports, or is found to be involved in slavery, servitude or forced or compulsory labour.

As an equal opportunity's employer, we're also committed to creating and ensuring a non-discriminatory and respectful working environment for our people. Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK.

3. Our business and supply chain

We are a construction company, who work on NHS sites. Our supply chain is predominately building materials and building contractors. All are approved through the NHS procurement team, in accordance with internal policies and procedures. We use very few agency team members (4 used in 16 years). We ensure that all permits and vetting processes are adhered to.

4. Our purpose:

- we keep people safe and provide peace of mind
- we protect and enhance the environment
- we use our information and expertise to help people make informed decisions
- create value and minimise cost

We engage with a range of suppliers. Our main suppliers provide technical and specialist construction related services, which support our core activity. Whilst we assess ourselves to have a generally low risk of modern slavery in our business activity, we acknowledge that construction agency staff are the highest risk areas for us and therefore focus on these appropriately.

Our suppliers are sourced through pre-qualified public sector frameworks, as well as through competitive tender on the open market. Our sourcing activity is undertaken in compliance with the Public Contract Regulations 2015.

5. Our policies

We are committed to doing the right thing by ensuring we respect human rights and the environment. We manage a governance framework for all material focus areas within our sustainable framework and follow best practice guidelines provided by the Government Commercial Function, on which our policy and processes are based.

The following policies are available to all staff:

- Code of conduct
- Whistleblowing policy
- Bullying and harassment policy
- Diversity and inclusion policy
- Recruitment and selection policy

6. Due diligence within our supply chain

We follow the Government Commercial Function guidance and build appropriate measures into our sourcing, supplier on-boarding and contract management processes, therefore minimising our exposure to risk. Using supply chain due diligence principles enables us to make a judgement on transactions and the integrity of our supply chain.

We aim to build relationships with our suppliers to ensure they comply with our values and that they are aware of our commitment to protect human rights and the environment. As part of our procurement processes, we require all of our suppliers to comply with the requirements of the Modern Slavery Act and include appropriate

7. Risk assessment and management

Following the guidance provided by the Government Commercial Function, we have undertaken a review of our current tier 1 supply base and categorised our contracts by assessing these against key modern slavery risk indicators.

We will engage with any suppliers identified as having areas of potential risk to provide guidance on the support that is available to help mitigate their own supply chain risk and improve their own policy and processes in regard to modern slavery. For example, making them aware of the UK Government Modern Slavery Assessment tool, which provides suppliers with tailored good practice recommendations to improve their anti-slavery activity.

We will continue to work closely with the supplier to remedy identified issues and put systems in place to ensure they meet our requirements and to also prevent issues in the future.

If a supplier fails to adequately remediate the issue, the relationship would be re-evaluated and if necessary, terminated.

8. Key performance indicators

Where potential modern slavery impacts are identified within a contract requirement, we will work with our suppliers to develop appropriate KPIs to monitor and manage performance in regard to these risks.

9. Training on modern slavery and trafficking

All managers are required to undertake mandatory modern slavery awareness training. We will ensure our staff involved in procurement activity are aware of and follow modern slavery procurement guidance on GOV.UK.



Dean Carter | Director

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