

## Modern Slavery Act Policy Statement for Downing

Downing including Downing Construction Ltd, George Downing Construction Ltd, Downing Property Services Ltd, Downing Property Management Ltd are dedicated to preventing modern slavery and human trafficking from taking place within its business and supply chain and we place the same expectation on all of our suppliers.

We have a zero-tolerance approach to modern slavery and human trafficking throughout the organisation. We are committed to acting ethically and with integrity in all our business dealings and relationships to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children consistent with our disclosure obligations under the Modern Slavery Act 2015.

The Company has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Company has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about internal control systems and procedures to ensure they are effective in countering modern slavery.

This policy statement will be made aware in the most appropriate method to all persons working for us including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners or persons working on our behalf in any capacity.

We expect the same high standards from all of our supply chain including contractors, suppliers and other business partners and that our suppliers will hold their own suppliers to the same high standards.

As part of our efforts to monitor, manage and reduce the risk of slavery and human trafficking occurring within our business or supply chains, we adopt the following due diligence procedures:

- Carrying out employment eligibility checks on all directly employed workers
- Undertaking the mandatory due diligence checks on all subcontractors and suppliers
- Working only with sub-contractors and suppliers who aspire to the same values

Our processes aim to:

- Identify, monitor and manage areas of potential risk in our business and supply chains
- Adopt a zero-tolerance approach to slavery and human trafficking throughout the organisation and our supply chains

Any stakeholder or employee who in the public interest raises genuine concerns under this policy will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns, even if they are proven to be unfounded.

The Company will take seriously breaches and will take the relevant steps and may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

The Company reserves the right to amend this policy at any time.

Any breaches of policy for staff will be treated as per our staff handbooks regarding breaches of policy and will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

***Further Actions, Approval and Endorsement***

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

We will ensure employees and new starters are aware of the risks of modern slavery and human trafficking in our business and supply chains by making them aware of the Company's Modern Slavery Act Policy Statement.

The company will also introduce a new online training platform available to all staff and new starters including a module for training and further awareness on Modern Slavery.

We will also review contracts regarding the supply of subcontract labour to ensure that the required eligibility checks are carried out.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Downing's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2021.

Signature: Julia Wren  
Director

Date: 12 April 2022