

Modern Slavery

1. Policy

- 11 This policy sets out important procedures regarding Modern Slavery.
- 12 This policy applies to all employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and business partners (which will hereinafter be referred to as “the relevant personnel” for the purpose of this policy).
- 13 Rules and procedures relating to Modern Slavery in the workplace are necessary to promote orderly employment relations and fairness in the treatment of employees. They enable the company to influence the treatment of employees, thereby assisting the business to operate effectively.
- 14 This policy does not form part of the contract of employment. It will be reviewed, updated and amended from time to time in line with business requirements and the company retains an absolute right to amend or withdraw this policy.

2. Introduction

- 21 This statement is made pursuant to section 54(1) Modern Slavery Act 2015. It constitutes Toppesfield’s slavery and human trafficking statement. We are committed to achieving the highest level of ethical standards and to implementing sound governance arrangements to ensure integrity and objectivity in our business activity. We embrace the principles of fairness, inclusion and respect in everything we do.
- 22 Toppesfield Limited was established in 2004 and remains the largest and most significant independent surfacing company operating nationally in the UK. We provide road surfacing and associated services including but not limited to production, surfacing, planning, reinforcement grids, anti-skid and lining to clients both in the public and private sector.

We embrace the principles of Fairness, Inclusion and Respect in all that we do, and this is underpinned by our core values of Care, Integrity, Innovation and Excellence. We expect these principles and values to determine the behaviour of every person involved in our activities, with managers leading by example to ensure these are upheld at all times.

- 23 We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.
- 24 Our Code of Conduct reflects our position of zero tolerance of modern slavery and human trafficking in any form and reinforces our commitment to acting ethically and with integrity in all our business relationships.
- 25 We are committed to achieving the highest level of ethical standards and strive to ensure integrity and objectivity in our business activity. It is the company’s responsibility to provide employees and members of our supply chain with a safe and confidential mechanism to raise concerns and report breaches of our standards, processes or protocols. Our whistleblowing policy outlines the various mechanisms for our employees to report any concerns or suspected breaches of our policies.

- 26 One of the mechanisms is our confidential SeeHearSpeakUp helpline and application enables employees and others to raise concerns or to seek advice on a matter related to compliance with the law, our published business ethics and our company Code of Conduct, directly with the business. The helpline is for all employees and for third parties with whom the company has a business relationship (including employees, contractors, customers and suppliers) if they observe wrongdoing or wish to raise concerns. The SeeHearSpeakUp allows for anonymous reporting using the confidential helpline: 0800 988 6818 or online form at www.seehearspeakup.co.uk/en/file-a-report

3. Due Diligence Process

- 31 This statement is made pursuant to section 54(1) Modern Slavery Act 2015. It constitutes Toppesfield's slavery and human trafficking statement. We are committed to achieving the highest level of ethical standards and to implementing sound governance arrangements to ensure integrity and objectivity in our business activity. We embrace the principles of fairness, inclusion and respect in everything we do.

4. Risk Assessment

- 41 We are aware that risks can arise from modern slavery and human trafficking from all aspects of our business, notably through our recruitment practices (including subcontracted employees), operational site management and supply of materials. We carry out risk assessments regarding our supplier and subcontractor chain to ensure that they are compliant with the Modern Slavery Act. Where issues are identified (including through our audit processes) that are not resolved to our satisfaction, we would review the on-going nature of the relationship. Appropriate actions are taken, including but not limited to, the removal of any non-compliant organisations from our approved supplier list where there are issues identified that remain unresolved.

5. Training

- 51 To make employees aware of the Act, the drivers and the implication of modern slavery, as well as the possible indicators, we share this statement with all employees and our supply chain business through our internal communication channels and a copy of this statement is available on the company's website.
- 52 Our business ethics are publicised internally and to our supply chain, and we have introduced a means by which both internal and external concerns can be reported to the business.

6. Our Journey

- 61 We understand that the risk of modern slavery and human trafficking is not static, and we must continue to improve our mitigation in the years ahead to ensure the company is alert to, and acts upon, emerging industry risks. As part of our continued commitment to improving compliance with the Modern Slavery Act 2015 we are embarking on the following initiatives:

Our Policies:

- An on-going review of our policies to ensure our workforce understand that our business is committed to acting ethically and with integrity, reflecting our position of zero tolerance with any form of modern slavery or human trafficking. Our whistleblowing policy encourages all our employees, customers and supply chain workers to report any concerns.

Our Supply Chain:

- Review of our pre-qualification questionnaire and suppliers' terms & conditions to re-enforce

our commitment to anti-slavery and human trafficking and to ensure this message is embedded within our supply chain.

- A review of our subcontracted labour terms & conditions to reflect our position of zero tolerance with any form of modern slavery or human trafficking.
- Implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

7. Control

7.1 This document is the property of Toppesfield Limited. It shall not be reproduced in whole or part nor disclosed to a third party without the authorisation of a Director or the HR Team.

7.2 Printed copies of this document or electronic copies maintained anywhere shall be deemed uncontrolled.

8. Further Information

8.1 Further information and guidance on this policy and procedure is available from the HR team.

9. Review of the Policy

9.1 The policy is subject to review from time to time, at least annually, and in consultation with management and legislation.

A handwritten signature in black ink, appearing to read "Bill Pryor".

Bill Pryor
Managing Director
1st September 2024

The above policy has been reviewed and updated following our 31st March 2024 financial year end.