

1. Policy Statement

Structura is committed to conducting its business ethically and with integrity. We have a zero-tolerance approach to modern slavery and human trafficking in all its forms, both within our own operations and throughout our supply chains. We are committed to ensuring that our business practices do not contribute to, or facilitate, modern slavery or human trafficking. This policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

2. Scope

This policy applies to all individuals working for Structura or on our behalf in any capacity, including employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners, regardless of their location.

3. Definitions

Modern Slavery: This encompasses slavery, servitude, forced or compulsory labour, and human trafficking. Human trafficking involves the recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power, or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Exploitation: Includes, but is not limited to, sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude, and the removal of organs.

4. Our Commitment

Structura is committed to:

- **Prohibiting** the use of modern slavery and human trafficking in our operations

and supply chains.

- **Conducting** due diligence to identify and assess potential risks in our supply chains.
- **Implementing** robust recruitment processes to ensure all employees are legally entitled to work and are not subject to forced labour.
- **Encouraging** transparency and accountability in our supply chain management.
- **Providing** effective grievance mechanisms for workers to raise concerns without fear of retaliation.
- **Investigating** thoroughly any allegations of modern slavery or human trafficking within our operations or supply chains.
- **Taking immediate and appropriate remedial action** where modern slavery or human trafficking is identified.

5. Risk Assessment and Due Diligence

We will undertake due diligence when engaging new suppliers and review existing suppliers on a regular basis. Our due diligence process will include:

- **Supplier assessments:** Evaluating potential and existing suppliers for their commitment to anti-slavery practices and their ability to comply with this policy.
- **Contractual obligations:** Including clauses in contracts that require suppliers to adhere to anti-slavery principles and allow for audit rights.
- **Risk mapping:** Identifying higher-risk areas in our supply chain, such as those involving high-risk geographical areas or sectors, or where there is a reliance on vulnerable labor.
- **Audits and site visits:** Where appropriate, conducting audits or site visits to assess compliance with anti-slavery standards.

6. Reporting Mechanisms

We encourage all individuals to report any concerns related to modern slavery or human trafficking. Concerns can be reported via:

- Your line manager or a senior manager.
- The Human Resources department.
- Company Office email address.

All reports will be treated with confidentiality and investigated promptly and thoroughly. No individual will suffer any detriment as a result of reporting in good faith a suspicion that modern slavery or human trafficking is taking place.

7. Training and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide:

- **Awareness training** to all employees.
- **Specialised training** to employees involved in supply chain management and procurement.

8. Breaches of Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal. We may terminate our relationship with any third party that is found to have breached this policy.

9. Policy Review

This policy will be reviewed annually, or more frequently if necessary, to ensure its continued effectiveness and compliance with relevant legislation and best practices.

Date of Last Review: 12/08/2025

Approved By: G. Haslam - Director, STRUCTURA Project Services Ltd