

Modern Slavery Policy.

Introduction

Modern slavery is a crime and a gross violation of fundamental human rights. It manifests in various forms, including slavery, servitude, forced and compulsory labour, and human trafficking—all of which deprive individuals of their liberty for personal or commercial exploitation.

At Primech Building Services Limited, we adopt a zero-tolerance stance toward modern slavery. We are committed to conducting our business ethically and with integrity while implementing and enforcing effective systems and controls to ensure that modern slavery does not occur within our operations or supply chains.

Our Business & Supply Chains

Primech Building Services Limited is dedicated to fostering trust and integrity in our supplier relationships. Our supplier selection and onboarding processes include rigorous due diligence, covering:

- Supplier reputation.
- Compliance with legal, health, safety, and environmental standards.
- References and evidence of adherence to ethical practices.

While we are not aware of any allegations of human trafficking or slavery involving our suppliers, we remain vigilant. Any credible suspicion or evidence would prompt immediate action, including reporting to relevant authorities.

Policies

To identify and prevent modern slavery, Primech Building Services Limited operates the following policies:

1. Whistleblowing Policy:

- Encourages employees, customers, and suppliers to report any suspicions of slavery or human trafficking.
- Ensures a confidential reporting mechanism to protect whistleblowers.

2. Code of Conduct:

- Clearly defines ethical behaviour and actions expected of employees representing the business.
- Reinforces high standards of employee conduct both domestically and internationally, including supply chain management.

Responsibilities

Primech Building Services Limited accepts overall responsibility for ensuring compliance with legal and ethical obligations related to modern slavery. The organisation is responsible for:

- Implementing this policy.
- Monitoring its use and effectiveness.

- Addressing queries and concerns regarding the policy.
- Auditing internal systems to ensure effective prevention measures.

Managers are tasked with ensuring their teams understand and comply with this policy. Adequate and regular training will be provided to raise awareness of modern slavery risks in supply chains.

Supplier Due Diligence

Primech Building Services Limited conducts thorough due diligence on all suppliers, both during onboarding and at regular intervals. Due diligence activities include:

- Assessing risks in service provisions.
- Auditing supplier practices, including health and safety, labour relations, and employment contracts.
- Requiring improvements for substandard employment practices.
- Sanctioning or terminating relationships with suppliers failing to meet requirements.

We require all suppliers to confirm that:

- They do not engage in forced, compulsory, or slave labour.
- Employees work voluntarily and have the right to leave.
- Employees are provided with fair employment contracts, including reasonable notice periods.
- Salaries are not withheld, and no deposits or bonds are required.
- Passports or work permits are not retained as a condition of employment.

Failure to comply with these standards will result in immediate contract termination.

Industry-Specific Considerations

1. Subcontractor Compliance:

- All subcontractors engaged in building services projects must demonstrate compliance with anti-slavery regulations.
- Regular monitoring of subcontractor practices ensures adherence to ethical labour standards.

2. Labour Recruitment Practices:

- Ensure recruitment agencies and labour suppliers provide evidence of fair hiring practices.
- Require all recruitment agencies to adhere to ethical sourcing principles.

3. Construction Site Monitoring:

- Conduct routine checks at construction sites to verify working conditions meet legal and ethical standards.
- Ensure on-site facilities are safe, sanitary, and meet health and safety requirements.

4. Material Sourcing:

- Verify the origin of building materials to ensure they are not produced using forced or child labour.

- Prioritise suppliers with certified ethical sourcing practices, such as Fairtrade or equivalent certifications.

5. Training for On-Site Personnel:

- Provide training to all on-site staff and contractors about recognising and reporting signs of modern slavery.
- Include modern slavery awareness in health and safety briefings.

Breaches of this Policy

Employees who violate this policy will face disciplinary actions, including potential dismissal for gross misconduct. Similarly, relationships with external individuals or organisations may be terminated if they breach this policy.

Supplier Obligations

Suppliers must:

1. Comply with the **Modern Slavery Act 2015** and implement policies, procedures, and practices to prevent modern slavery, human trafficking, forced labour, or exploitation within their operations and supply chains.
2. Conduct due diligence and risk assessments to identify and address potential risks of modern slavery.
3. Provide documentation, certifications, or other evidence of compliance with the Modern Slavery Act upon request.

Primech Building Services Limited is unwavering in its commitment to combating modern slavery. We encourage open dialogue and collaboration with employees, suppliers, and stakeholders to uphold ethical practices and eliminate modern slavery risks across our operations and supply chains.

Declan Ausher



Managing Director

Dated – 8th October 2024