

Modern Slavery and Human Trafficking Statement 2025

Introductory Statement from the Managing Director

Modern slavery and human trafficking can take various forms, including slavery, servitude, forced and compulsory labour – all of which involve the deprivation of a person's liberty for personal or commercial gain. ARC (Norwich) Ltd maintains a **zero-tolerance** approach to such practices. We remain committed to acting **ethically, transparently**, and with **integrity** in all our business dealings and relationships.

We expect the same exacting standards from all our contractors, suppliers, and business associates, and require them to uphold equivalent standards within their own supply chains.

Our Supply Chain

The construction industry remains a sector at substantial risk for modern slavery due to the complexity of supply chains and the reliance on temporary labour. We work proactively to mitigate this risk by engaging **only credible suppliers and contractors**, and by implementing robust procurement and auditing processes to reduce the potential for slavery or trafficking.

Our Practices

We ensure that all directly employed workers are paid **at least the UK National Minimum Wage or National Living Wage**, based on age eligibility.

All workers undergo **eligibility to work checks** as part of our recruitment process, or via agency suppliers. Where applicable, **DBS (Disclosure and Barring Service)** and **PVG (Protecting Vulnerable Groups)** checks are conducted in accordance with statutory requirements.

Adherence to Our Values and Policies

We expect everyone working with or for ARC (Norwich) Ltd – whether permanent, fixed-term, or temporary – to adhere to our ethics, values, and policies, including -

- Anti-Slavery and Human Trafficking Policy
- Money Laundering and Terrorist Financing Prevention Policy
- Anti-Bribery and Corruption and Fraud Policy

Suppliers and subcontractors are bound by terms in our standard contracts and are expected to implement **due diligence procedures** within their own supply chains.

Whistleblowing

We encourage all staff, suppliers, and partners to **raise concerns** without fear of retaliation. Our **Whistleblowing Procedure** is clearly communicated and includes access to an **external, anonymous hotline**.

Grievances or Complaints Received

As of the financial year ending **31 October 2024**, **no grievances or complaints** related to modern slavery or human trafficking were reported.

Training and Awareness

We continue to invest in training to help our workforce identify and address risks:

- All staff must complete the eBook "**What is Modern Slavery?**"
- Key personnel undertake **eLearning modules** on modern slavery, tracked as a **KPI**.

Progress and Future Commitments for 2025–2026

We are committed to continuous improvement and plan to implement the following steps during the financial year ending **31 October 2025**:

- **Supply Chain Training:**
Launch a new training module for employees with procurement responsibilities to help identify high-risk indicators of modern slavery in supply chains.
- **Increased Awareness Campaigns:**
Publish internal articles and host toolbox talks on modern slavery in our internal newsletter and employee briefings.
- **Expanded Auditing:**
Expand supplier audits to include **tier two subcontractors**, where feasible, to enhance visibility within the supply chain.
- **Policy Review and Risk Analysis:**
Conduct a full review of policies considering legislative updates, and reassess risk based on **post-Brexit labour trends** and **international sourcing**.

Key Performance Indicators (KPIs)

For 2025, our modern slavery KPIs include:

- Percentage of supply chain partners who have confirmed policy receipt.
- Number of agency audits completed, and actions taken.
- Number of employees completing training modules
- Number of grievances or concerns raised and resolved.

We review our policies, procedures, and training materials **annually** to ensure ongoing compliance with best practice and UK legislation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes ARC (Norwich) Ltd.'s slavery and human trafficking statement for the financial year ending 31 October 2025

Chris Ford

Managing Director

June 2025