

## Modern Slavery and Human Trafficking policy statement

This statement is made in accordance with the Modern Slavery Act 2015 and constitutes Aureos's modern slavery and human trafficking statement for the financial year ending 31 October 2024.

Aureos has implemented policies and procedures to ensure fair and ethical treatment, these include:

- Equal opportunities and anti-discrimination
- Training and development
- Health, safety and wellbeing
- Fair pay
- Whistle-blowing

Aureos have signed up to the Gangmasters & Labour Abuse Authority construction protocol and we are signatories of this. It is aimed at eradicating slavery and labour exploitation in the construction industry. The construction protocol commits signatories to:

- Work in partnership to protect vulnerable workers
- Agree to share information, where possible, to help stop or prevent the exploitation of workers
- Work together to manage information sensitively and confidentially
- Commit to raising awareness within the supply chain
- Maintain momentum through this protocol by communicating regularly

Aureos undertakes its works through a combination of directly employed people and engaging the supply chain through full subcontract or temporary employment of people through recruitment agencies.

### Supply Chain

Aureos's external supply chain is predominantly made up of organisations utilised across the business. It directly contracts these organisations to complete work on its behalf or for supply of materials, labour or other services.

Aureos's due diligence process for suppliers incorporates a review of the controls undertaken by the supplier. All organisations that the company deals with are required to confirm that both they and their supply chain are not knowingly involved in slavery and human trafficking. Such a declaration is required by all companies in order to be added to the company's preferred supplier list and forms part of the 'Supply Chain Onboarding Management Process' ([GRP-PROC-PRO-001](#))

### Risk

Where Aureos has most control, in respect of modern slavery and human trafficking, is in recruitment of direct employees. We have procedures in place to ensure that recruitment is completed in line with regulatory requirements and our people have access to rights and appropriate conditions. We view this area as low risk.

The highest risk to Aureos is through our temporary staff who are recruited via recruitment agencies. Our recruitment process conforms to regulatory requirements and the fair and ethical treatment of temporary employees.

The policy is to periodically audit our roster of recruitment agencies across a range of topics as part of a continuous improvement process.

Aureos's policy includes a Pre-qualification Questionnaire and on-boarding process for agencies that require the suppliers to produce documentation to confirm that they are compliant with requirements for modern slavery and payment of wages. As further risk mitigation and assurance, this information is reviewed externally by our insurers who confirm that all the necessary standards are met for supply as a pre-requisite to contract engagement.

### Training

Training modules for modern slavery, corporate social responsibility, fairness and inclusion, and the 'right to work' are made available for voluntary completion as part of the Aureos Learning and Development package.

Aureos and its management team fully support this policy and are committed to provide competent personnel and financial resources to implement it.

This policy is governed by and supports our Aureos Code of Conduct and recognises the facility afforded by the Whistleblowing policy statement ([GRP-CAL-PCY-029](#)).



Darren James  
CEO

Date: Oct 2024