



ABBAY PYNFORD

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. Introduction

This Modern Slavery and Human Trafficking Statement ("**Statement**") is made pursuant to the Modern Slavery Act 2015 s.54 and sets out the steps that Abbey Pynford Holdings Limited ("**Abbey Pynford**") is taking and will continue to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

2. Organisational Structure

Abbey Pynford Holdings Limited is the parent of a group of English based construction companies. Abbey Pynford was founded in 1988 Abbey Pynford operates as a specialist ground engineering design and build construction specialist with considerable experience in the complex fields of open site design and build foundations, basements, underpinning, piling and geo-structural engineering. Abbey Pynford also operates a plant hire company which services the sectors it works within.

3. Supply Chains & Due Diligence

Abbey Pynford's supply chains include the provision of goods and services required in order for it to provide ground engineering design and build services to its customers in the construction sector.

Abbey Pynford undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The due diligence process includes checking VAT registrations, auditing suppliers at random and ensuring that they hold certifications and accreditations relevant to their industry sector.

Abbey Pynford expects the highest standards from all of its suppliers and is putting in place various measures to mitigate the risk of slavery or human trafficking taking place in its supply chains or in any part of its business and, as such, it:

- endeavours to build strong relationships with its suppliers and make them aware of Abbey Pynford's expectations regarding ethics, anti-bribery and modern slavery at the outset by incorporating such obligations into its contracts; and
- endeavours to identify, evaluate and actively monitor the risk areas in the business and its supply chains.

4. Training

To ensure a good understanding of the risks of modern slavery and human trafficking in its business and supply chains, Abbey Pynford will provide regular training to all staff so that they understand the risks of modern slavery and human trafficking and know what to do if they suspect that it is taking place within its supply chain.

5. Policies

Abbey Pynford is committed to ensuring that there is no modern slavery or human trafficking in its business or supply chains. This Statement affirms its intention to act ethically in its business relationships.

The following policies set down its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy** – Abbey Pynford encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.



ABBHEY PYNFORD

- **Employee Code of Conduct** - The Employee Code of Conduct sets down the actions and behavior expected of employees when representing Abbey Pynford.
- **Corporate Social Responsibility (CSR) Policy** – Abbey Pynford’s CSR policy summarises how it manages its environmental impacts and how it works responsibly with suppliers and local communities.
- **Ethics Policy** – Abbey Pynford’s Ethics Policy sets out how it is expected to behave as an organisation and how it expects its employees and suppliers to act.

6. Performance indicators

Abbey Pynford uses the following key performance indicators (KPIs) to measure how effective it is in ensuring slavery and human trafficking is not taking place in any part of its business or supply chains, including:

- actively identifying and assessing the potential risk areas in its supply chains;
- continuously monitoring and investigating any reports received, internally or externally, implicating modern slavery practices within Abbey Pynford; and
- providing regular training to members of staff.

7. Approval

The Board of Directors fully endorse and approve this Statement and is committed to its implementation. This Statement will be regularly reviewed and updated as necessary.

Name: Robert Mitchell

Position: Group Managing Director, Abbey Pynford Limited

Date: 08.03.2024

Signature: 