9th September 2026

REFERENCE: P - 023

Wallace Groundwork’s Ltd

Policy

ETHICAL LABOUR POLICY

Wallace Groundwork's Ltd
The Hub at Gladstone Buildings Broadleys
Chesterfield
Derbyshire
United Kingdom

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1. General Statement of Intent

The Company is committed to conducting its business in an ethical, responsible and socially responsible manner and to ensuring that all persons working for or on behalf of the Company are treated fairly, with dignity and respect.

The Company recognises its responsibility to prevent unethical labour practices, exploitation, forced or compulsory labour, human trafficking, child labour and other forms of abuse within its own operations and, so far as reasonably practicable, within its supply chain.

The Company is committed to complying with all applicable UK employment, equality, health and safety, minimum wage and working-time requirements and to promoting high standards of ethical employment. Workers are entitled to appropriate employment rights, including minimum wage and statutory rest and holiday protections where applicable.

The Company will:

- Prohibit forced, bonded, trafficked or compulsory labour within its business and supply chain.
- Prohibit the use of child labour and ensure that young workers are employed only in accordance with applicable legal requirements.
- Ensure that workers are recruited and employed through lawful and responsible practices.
- Ensure that workers receive wages and benefits in accordance with applicable UK legal requirements and contractual arrangements.
- Respect applicable working-time, rest-break and holiday requirements.
- Promote a workplace free from discrimination, harassment, bullying, victimisation and unfair treatment.
- Respect the dignity, privacy and human rights of employees and other workers.
- Ensure that workers are not required to surrender identity documents or personal possessions as a condition of employment, except where lawful and genuinely necessary.
- Not tolerate recruitment practices involving deception, coercion, threats, recruitment fees or other practices that could place workers at risk of exploitation.
- Provide appropriate channels through which employees and workers can raise concerns without fear of retaliation.
- Investigate credible allegations of unethical labour practices and take appropriate corrective and remedial action.
- Assess relevant ethical labour and modern slavery risks within our operations and supply chain.

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- Apply appropriate due diligence when selecting and managing contractors, labour providers, suppliers and subcontractors.
- Provide appropriate information and training to employees whose roles may expose them to ethical labour or modern slavery risks.
- Monitor the effectiveness of our ethical labour arrangements and continually seek to improve our performance.

The Company will take a proportionate, risk-based approach to ethical labour due diligence, recognising that risks may vary according to the nature of the work, recruitment arrangements, location, labour model and supply chain.

Where concerns regarding forced labour, human trafficking or other serious exploitation are identified, the Company will prioritise the safety and wellbeing of affected workers and take appropriate action. The Company's approach will seek to avoid actions that could inadvertently increase the risk of harm to vulnerable workers.

Where legally required, the Company will comply with the transparency requirements of **Section 54 of the Modern Slavery Act 2015**. Organisations meeting the statutory criteria, including carrying on business in the UK, supplying goods or services and having an annual turnover of £36 million or more, are required to publish an annual modern slavery statement.

Where the Company is not legally required to publish a modern slavery statement, it will nevertheless seek to maintain proportionate and appropriate arrangements for preventing and addressing modern slavery and unethical labour practices.

Management will provide appropriate resources and leadership to implement this policy. All employees, contractors, suppliers and other relevant parties are expected to support the Company's commitment to ethical labour and to report suspected concerns promptly.

The Company will not tolerate retaliation against any person who raises a genuine concern regarding unethical labour practices, exploitation, modern slavery or other breaches of this policy.

This Statement of Intent will be communicated to relevant employees, contractors, suppliers and other stakeholders as appropriate. It will be reviewed periodically and whenever there are significant changes to the Company's activities, supply chain, legal requirements or identified ethical labour risks.

Author	Nicola Parker
Author Job Role/Position	General Manager
Author Signature	
Signature Date	9th September 2026

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3. Arrangements

3.1.

The Company will maintain appropriate arrangements to ensure that ethical labour standards are applied throughout its own operations and, where reasonably practicable, throughout its supply chain. The arrangements will be proportionate to the size, nature and risk profile of the Company's activities.

1. Responsibilities

Senior Management will provide leadership, resources and oversight to ensure that ethical labour standards are maintained.

Managers are responsible for implementing this policy within their areas of responsibility and for responding appropriately to concerns.

Procurement and Contract Managers will consider ethical labour risks when selecting and managing suppliers, contractors, subcontractors and labour providers.

Employees are expected to comply with this policy and report suspected unethical labour practices.

2. Recruitment Practices

The Company will ensure that recruitment is undertaken fairly, transparently and lawfully.

Workers will be provided with appropriate information regarding:

- The nature of the role.
- Terms and conditions of employment.
- Pay and benefits.
- Working hours.
- Relevant workplace requirements.
- Any deductions from wages.
- Accommodation arrangements where applicable.

The Company will not knowingly use deceptive or coercive recruitment practices.

3. Right to Work

The Company will undertake appropriate right-to-work checks in accordance with applicable UK requirements before employing workers.

Records of checks will be retained in accordance with legal and Company requirements.

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Where labour providers or recruitment agencies are used, the Company will take reasonable steps to ensure that they operate lawfully and responsibly.

4. Forced Labour and Modern Slavery

The Company has zero tolerance for forced, bonded, trafficked or compulsory labour.

Indicators of potential exploitation may include:

- Threats or intimidation.
- Restriction of movement.
- Withholding wages.
- Excessive or unlawful deductions.
- Retention of identity documents.
- Debt bondage.
- Deceptive recruitment.
- Workers being required to pay inappropriate recruitment fees.
- Excessive working hours.
- Workers being unable to leave employment freely.

Any concerns will be reported to management and investigated appropriately.

Where there is an immediate risk to an individual, appropriate action will be taken to protect their safety and wellbeing.

5. Child Labour and Young Workers

The Company will not employ children in breach of applicable UK legal requirements.

Young workers will be subject to appropriate arrangements regarding working hours, supervision, health and safety and prohibited or restricted work.

Where young workers are employed, relevant risk assessments will take their age, experience and vulnerability into account.

6. Pay and Employment Conditions

The Company will ensure that employees receive pay and employment conditions in accordance with applicable UK legislation and their contractual arrangements.

The Company will maintain appropriate records relating to:

- Pay.
- Working hours.

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- Holiday entitlement.
- Absence.
- Overtime.
- Relevant deductions.

Unlawful or inappropriate deductions from wages will not be permitted.

7. Working Hours and Rest

Working hours will be managed in accordance with applicable UK requirements.

The Company will monitor working arrangements to identify excessive hours, inadequate rest or other conditions that could adversely affect employee health, safety or wellbeing.

Where appropriate, working-time arrangements will be reviewed following complaints, incidents or other identified concerns.

8. Equality, Diversity and Non-Discrimination

The Company is committed to providing a workplace free from unlawful discrimination, harassment, bullying and victimisation.

Employment decisions will be based on legitimate and relevant factors such as competence, qualifications, experience and suitability for the role.

The Company will not tolerate unfair treatment based on protected characteristics or other inappropriate grounds.

9. Dignity at Work

All employees and workers will be treated with dignity and respect.

Bullying, harassment, intimidation, threatening behaviour and abusive treatment will not be tolerated.

Concerns will be dealt with fairly, sensitively and in accordance with Company procedures.

10. Freedom to Raise Concerns

Employees and workers will have appropriate channels through which they can raise concerns about:

- Working conditions.
- Pay.
- Working hours.
- Treatment by managers or colleagues.
- Recruitment practices.
- Modern slavery or forced labour.

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- Discrimination or harassment.
- Health and safety.
- Other breaches of this policy.

Concerns may be raised with a line manager, senior manager or through the Company's grievance or whistleblowing arrangements.

11. Protection from Retaliation

The Company will not tolerate victimisation or retaliation against a person who raises a genuine concern or assists with an investigation.

Concerns will be handled appropriately and, wherever practicable, confidentially.

12. Suppliers and Subcontractors

The Company will assess relevant suppliers, subcontractors and labour providers to identify ethical labour risks.

Depending on the level of risk, assessment may include:

- Company policies.
- Ethical labour arrangements.
- Modern slavery policies or statements.
- Recruitment practices.
- Workforce arrangements.
- Employment practices.
- Previous incidents or concerns.
- Relevant certifications or accreditations.
- Evidence of compliance with applicable legislation.

Higher-risk suppliers may be subject to additional checks or monitoring.

13. Labour Agencies and Labour Providers

Where labour agencies or employment businesses are used, the Company will take reasonable steps to ensure that they are reputable and operate in accordance with applicable legal requirements.

Where appropriate, the Company will seek evidence that workers supplied through agencies are:

- Legally entitled to work.
- Paid appropriately.
- Provided with suitable employment information.

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- Not subject to unlawful deductions or recruitment fees.
- Provided with appropriate health and safety information.

Concerns regarding labour providers will be investigated and appropriate corrective action taken.

14. Supply Chain Due Diligence

The Company will take a proportionate, risk-based approach to assessing ethical labour risks within its supply chain.

Risk factors may include:

- Use of temporary or migrant labour.
- Labour-intensive activities.
- Complex subcontracting arrangements.
- Recruitment through third parties.
- Geographic or sector-specific risks.
- Previous concerns or poor performance.
- Lack of transparency within the supply chain.

Where significant risks are identified, additional information or assurances may be requested.

15. Contractor and Subcontractor Management

Contractors and subcontractors will be expected to comply with the Company's ethical labour requirements.

Where appropriate, contractual arrangements will require contractors to:

- Comply with applicable employment legislation.
- Prevent forced and child labour.
- Maintain appropriate working conditions.
- Treat workers fairly and with dignity.
- Report relevant concerns.
- Cooperate with reasonable Company assessments or investigations.

Serious or persistent breaches may result in corrective action, suspension or termination of the relationship.

16. Training and Awareness

Relevant employees, particularly managers, procurement personnel and those responsible for contractor management, will receive appropriate information or training regarding ethical labour risks.

Awareness may include:

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- Modern slavery.
- Forced labour indicators.
- Responsible recruitment.
- Child labour.
- Worker exploitation.
- Grievance arrangements.
- Whistleblowing.
- Supplier due diligence.
- How to escalate concerns.

17. Reporting and Investigation

Suspected breaches of this policy will be reported promptly to an appropriate manager.

The Company will assess the concern and determine whether further investigation is required.

Investigations will be undertaken fairly and proportionately, with appropriate consideration given to the protection and wellbeing of affected workers.

Where a breach is substantiated, appropriate corrective and remedial action will be taken.

18. Corrective Action

Where unethical labour practices are identified, the Company will consider appropriate corrective measures.

These may include:

- Improvement plans.
- Additional monitoring.
- Further training.
- Corrective action by suppliers.
- Increased management oversight.
- Suspension of work.
- Removal of a supplier or contractor from the approved list.
- Termination of contractual arrangements where appropriate.

The Company will consider the potential impact of corrective action on affected workers and will seek to avoid inadvertently increasing their vulnerability.

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19. Records

Appropriate records will be maintained, including where relevant:

- Recruitment checks.
- Right-to-work checks.
- Employment records.
- Supplier assessments.
- Contractor assessments.
- Labour agency assessments.
- Ethical labour questionnaires.
- Modern slavery risk assessments.
- Training records.
- Complaints and investigations.
- Corrective actions.
- Supplier monitoring records.

Records will be managed in accordance with the Company's document control and data protection arrangements.

20. Monitoring and Review

The effectiveness of the Company's ethical labour arrangements will be monitored through appropriate means, which may include:

- Supplier reviews.
- Contractor assessments.
- Internal audits.
- Employee feedback.
- Grievance records.
- Whistleblowing reports.
- Incident investigations.
- Review of working hours and pay arrangements.
- Periodic policy reviews.

Where weaknesses are identified, appropriate improvements will be implemented.

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21. Modern Slavery Statement

Where the Company is subject to the statutory requirements of Section 54 of the Modern Slavery Act 2015, it will prepare and publish an appropriate annual modern slavery statement in accordance with applicable requirements.

The statement will describe the steps taken by the Company to identify and address modern slavery and human trafficking risks within its operations and supply chain.

Where the Company is not legally required to publish a statement, it will nevertheless consider whether a voluntary statement or equivalent communication would be appropriate.

22. Review of Arrangements

This policy and its associated arrangements will be reviewed at least annually and following significant changes to the Company's activities, workforce, supply chain or applicable legal requirements.

The Company will use information obtained through monitoring, employee consultation, supplier reviews, incidents and investigations to continually improve its ethical labour practices.

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I have read and understood the entirety of this document. Where there was something I did not fully understand, it was explained to my satisfaction. I agree to comply with the required directions and instructions in this document. If at any point, I cannot comply, I will highlight this before continuing.			
Name	**Job Role / Position**	**Signature**	**Date**

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