

Anti-Slavery & Human Trafficking Policy



Statement

The Lawton policy for anti-slavery and human trafficking sets out the minimum behaviour we expect from our employees and supply chain partners.

The policy deals with the specific issues associated with modern slavery and human trafficking.

Modern slavery is a crime and a violation of an individual's fundamental human rights. It takes various forms, such as slavery, servitude, forced or compulsory labour and human trafficking, all of which have the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain in common.

We have a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within the company or our supply chain.

We are also committed to ensuring that there is transparency in our business and in our approach to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our sub-contractors, suppliers and other business partners, and as part of our contracting processes, we will include specific prohibitions concerning modern slavery, whether of adults or children and we expect that our suppliers will hold their own suppliers to the same high standards. Lawton's approach will be to work with our supply chain partners to improve performance standards, but ultimately we may have to review whether we can continue on-going relationships if our standards cannot be met.

Who does this policy apply to?

This policy applies to all employees, contractors and clients. This includes (but is not limited to) all staff and operatives directly employed by Lawton Building Engineering Services Limited and all other individuals carrying out work on behalf of, or providing a service to, the company such as consultants, contractors (including subcontractors, trade contractors and other specialists), apprentices and agency workers at company sites, offices and in company vehicles.

Responsibility for the Policy

The board of directors at Lawton have overall responsibility for ensuring this policy complies with our legal and ethical obligations.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Compliance

All employees and persons or companies engaged with the company must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of us all.

Anti-Slavery & Human Trafficking Policy



Any activity that might lead or suggest a breach of this policy must be avoided.

The following should be reported to a Director and/or your line manager immediately:

- Any instance of modern slavery occurring in any part of our business or supply chain.
- Any occurrence of a breach of this policy.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within our business or supply chain constitutes any of the various forms of modern slavery, raise it with your line manager, or a Lawton Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers detrimental treatment as a result of reporting in good faith their suspicion that modern slavery in whatever form is or may be taking place in any part of our business or in any of our supply chain. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable outcomes connected with raising any concerns.

If you have a concern or suspect a violation of this policy, we want you to speak up immediately. Speaking up can be a difficult thing to do, so be reassured that all information received by the company will be treated seriously and investigated appropriately. There will be no adverse ramifications by the company towards the person reporting a concern if the person reporting the concern has acted in good faith and believes their information is accurate, even if the investigation conclusion does not support the concern. Some issues can be addressed by speaking directly to the person whose conduct has caused the concern, however, we understand that this is not always possible and we would suggest you speak to your line manager and/or a Director if you are unable to speak to the person involved directly.

Communication and awareness of this policy

Regular training on this policy and on the risks our business faces from modern slavery in its supply chain will be provided as necessary.

Our zero-tolerance policy and the risks to our business relationship with the stakeholders and partners of our company will be reinforced as appropriate.

Breach

Any non-compliance with this policy by employees will be treated as an act of gross misconduct, and may result in disciplinary action up to and including dismissal, and by contractors, agents or other third parties working on our behalf, in termination of contract.

If you have any queries regarding this policy, please contact a Director.

Signed
Director

A handwritten signature in blue ink, appearing to be a stylized 'G' or 'C' followed by a flourish.

Anti-Slavery & Human Trafficking Policy



REVISION HISTORY

Revision	Description of Revision	Date	Issue Authority
Rev 06	Revision history and issue authority sections added.	13/01/2026	SL
Rev 07			
Rev 08			
Rev 09			
Rev 10			

ISSUE AUTHORITY

Issue Authority Signed: 	Principal Author Signed: 
Issue Authority Printed: S LAWTON	Principal Author Printed: S LAWTON
Position: DIRECTOR	Position: DIRECTOR
Date: 13 January 2026	