

## Annual Modern Slavery Statement

### Introduction

Shepley Engineers is committed to the prevention of Modern Slavery and Human Trafficking and will not tolerate or condone any such identified act within any aspect of our business activities.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015, it sets out the activities undertaken by the Company in respect of the prevention of Modern Slavery and Human Trafficking and constitutes the Company's annual statement for the financial period 1<sup>st</sup> October 2023 to 30<sup>th</sup> September 2024.

### Organisational Structure

We provide a diverse range of specialist construction and engineering services in support of the creation and maintenance of assets for both public and private sector customers in the Energy Sector. Our work is conducted solely in the United Kingdom and delivered by a directly employed workforce all of whom are fully eligible to work within the United Kingdom, and many are regularly subject to various levels of security vetting.

Shepley Engineers recruit either directly or via a limited number of reputable recruitment partners, who are required to successfully complete our supply chain due diligence process, prior to being accepted as a recruitment partner.

We believe that no worker should pay for a job. The cost of the recruitment of ANY worker engaged by us will be borne by the company not the worker and, as part of our due diligence and risk identification processes, we will ensure that our supply chain and recruitment partners also adhere to this principle.

### Supply Chain

Given the nature of our organisational structure, model of directly employed work delivery and our use of a UK based Supply Chain, we consider that any exposure to risk of Modern Slavery or Human Trafficking is extremely low and that should any risk exist it is most likely to be within the extended Supply Chain. We work closely with our Tier 1 members of our Supply Chain in the identification of such risk to ensure it is addressed in an appropriate manner.

### Modern Slavery Policy

We have implemented a comprehensive policy in slavery and human trafficking which is available upon request. This policy details our business approach to the prevention of Modern Slavery and Human Trafficking, along with the processes used to support and deliver our commitment. This policy and commitment has been communicated to our Tier 1 Supply Chain partners for their information and action.

We operate a risk-based approach to the identification of Slavery and Human Trafficking the

## Contact Us.

### Shepley Engineers

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principle of which is based on the location of the product or service, industry sector, supplier relationships and existing data held supported by additional information and guidance obtained from, but not limited to, sources such as the Global Slavery Index, Corruption Perceptions Index and US Department of Labour Lists of Goods and Suppliers.

### **Due Diligence and Identification of Risk**

Our policy of direct employment is supported by robust processes which ensure that an individual's identity is confirmed, and they have a legitimate right to work in the United Kingdom. This policy and the right to work checks undertaken by our staff minimise the risk of employing forced labour or those who may be subject to human trafficking.

Where we utilise labour only sub-contractors we have introduced due diligence checks to ensure that, as a minimum, labour providers comply with our commitment to the Prevention of Modern Slavery and their processes for recruitment contain no illegal labour practices.

Notwithstanding that our Supply Chain is primarily UK based. Part of our supplier assessment questionnaires request Statements and Policies on Modern Slavery. This supplier assessment process is now part of normal business.

### **Communication and Training**

Shepley Engineers commitment to the prevention of Modern Slavery and Human Trafficking emanates directly from our Board of Directors. Their leadership and commitment to this important social issue has been clearly communicated both internally to employees and externally to subcontractors and Tier 1 Supply Chain partners.

Employees have received awareness training in relation to Modern Slavery and in the last year we have completed refresher training with the senior team and employees who have a direct responsibility and involvement for the engagement of workers and for dealing with supply chain matters. Our main procurement leads have also undertaken ethical procurement and supply training through CIPS. The training involves understanding that ethical sourcing is the process of sourcing products in a sustainable and responsible way and about ensuring that the workers involved in making the goods / products we procure are safe and working in a viable environment free of fraud, corruption, and bribery. Human rights are respected, and workers are paid a living wage and treated fairly.

We have reviewed our supply chain management process, including the management of Modern Slavery, and we believe our processes are robust. We have implemented a league table to assess and track our top 50 companies by spend, helping us better evaluate performance and risk. In the coming year, we propose to refresh our audit plan for these top 50 companies to ensure the information and records provided are adequate.

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Developing high performing people,  
**building a legacy of excellence.**

We will utilise our annual statements to reaffirm our continued commitment and communicate this evolution including the steps we have taken and will continue to take to deal with this socially important issue.

The Board of Directors have reviewed, accepted and fully support this statement and formally approved it on 20<sup>th</sup> March 2025.

A handwritten signature in dark blue ink, appearing to read 'G. Jakubowski'.

Gavin Jakubowski  
**Managing Director**  
**Shepley Engineers**

20<sup>th</sup> March 2025

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