

Modern Slavery Strategy

Capstone Construction is committed to understanding the risks associated with modern slavery and human trafficking and strive to ensure that there is no modern slavery within our own business, our sub-contractors, and our supply chain. We will drive a policy to prevent and prohibit modern slavery throughout the organisation.

Statement of Intent

Further to the above strategy, and the need to ensure compliance with all relevant legislation, regulation, and best practices, Capstone Construction shall:

- Ensure the policy implemented throughout the organisation reflects the requirements of the Modern Slavery Act 2015 and is proportionate to the risks faced by our business
- Ensure our Directors, Senior Management Teams, Recruitment Personnel, and those involved in approval and control our sub-contractors and the supply chain are equipped, and committed to implementing effective measures to prevent, monitor and eliminate any modern slavery within the organisation and any organisation whom we associate our service and product with
- Assess the modern slavery risks that the company faces by carrying out research into the markets we operate within and clientele with whom we liaise
- Exercise due diligence whenever the company is represented either by an employee or by a third party through the use of background checks of such personnel and any associated organisation
- Not tolerate or support any act associated with modern slavery and will issue the appropriate disciplinary action, termination of contract etc and where necessary, dismissal and/or legal action as result of any discovery
- Issue company employees with a copy of the company policy during induction to the organisation, and, where necessary, re-issue if and when revisions of the document are made. This is to ensure clear communication of both the company stance on the matter and the expectations and requirements set upon our workforce. Awareness will be raised through company-wide Tool Box Talks, posters, and flyers also.
- Monitor and review the effectiveness of steps taken to control this risk at regular intervals to ensure compliant with legislation and appropriate to the business needs

Note- Due to our operations being based solely within the UK and with Approved UK based Contractors and Suppliers only, there are no particular high-risk activities or countries that flag up in relation to modern slavery. However, Capstone Construction will review these risks regularly to ensure the statements contained within this policy are relevant and will amend our policy and accompanying processes where required.

To seek continual improvement, and assist in the implementation of this Policy, we will utilise external support as appropriate and seek advice on matters of this nature from our appointed competent personnel.



Rhona Donnelly (Managing Director)