

HSPS012-Modern Slavery

Downwell Enabling Ltd recognises that as a commercial organisation it has a moral and social responsibility to take a zero-tolerance approach to modern slavery in all forms.

We are committed to preventing slavery and human trafficking in our corporate activities, and to ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

Current Activity:

We undertake due diligence when considering taking on new suppliers and are in the ongoing process of reviewing our existing suppliers. This due diligence includes:

- Understanding our supply chain so as to identify and assess particular product or geographical risks of modern slavery and human trafficking.
- Evaluating modern slavery and human trafficking risks through the completion of our 'Quality and Sustainability Agreement' and our 'Supplier Declaration'.
- Conducting supplier audits – our Supplier Quality Managers work with suppliers throughout the UK.
- Terminating our relationship with suppliers that fail to improve their performance in line with an action plan or violate our supplier code of conduct.

We operate the following policies that assist our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

Organisation structure, business and supply chains

Downwell Enabling Ltd operates as a UK-based commercial organisation providing demolition, enabling, processing and construction services. The company operates through a central management structure led by its Board of Directors (See HSPS011-Company Structure & Employee Responsibilities). Our supply chains primarily consist of UK-based suppliers, subcontractors, and service providers supporting our operational delivery.

Risk assessment and management

We recognise that modern slavery risks may arise within certain areas of our supply chain, particularly where there is reliance on subcontracted labour or geographically dispersed suppliers. To mitigate these risks, we undertake structured risk assessments during supplier onboarding and periodic reviews, supported by supplier declarations, audits, and contractual obligations. Identified risks are managed through corrective action plans and ongoing supplier engagement.

Effectiveness and performance monitoring

We are committed to continually improving our approach to managing modern slavery risks. While formal performance indicators are currently being developed, we monitor effectiveness through existing processes such as supplier due diligence activities, audit outcomes, and staff training completion. We intend to further enhance our reporting and measurement capabilities over time.

Whistleblowing Policy-we encourage all our employees, to report any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment, and any other matter of a serious nature. The Modern Slavery Act 2015 (the "Act") is specifically mentioned within this policy which is published in the Company handbook.

Quality and Sustainability Agreement-we are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to declare that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of the Company's Quality and Sustainability Agreement will lead to the termination of the business relationship.

Business Ethics Policy-our policy sets out the core values which we expect to be observed throughout the Company. The policy specifically mentions the Act and is published in the Company handbook.

The Company requires all employees working in supply chain management and relevant roles to complete training on how to assess the risk of slavery and human trafficking in relation to various aspects of the business, how employees can identify the signs of slavery and human trafficking and what should be done if this activity is suspected.

Awareness training is provided for all main board members and entity directors and any other staff in relevant and appropriate roles.

This statement has been approved by Directors of Downwell enabling who will review and update it annually.

Signed: _____ 

Matthew Phillips – CEO

Date: 02/03/2026