



Excellence



Relationships



Teamwork



Pride

Lorne Stewart Plc
HUMAN RESOURCES

Modern Slavery Statement



Only print this front cover if necessary



MAKING THE DIFFERENCE

in our approach to Health, Safety & Wellbeing

**THINK SAFE
DRIVE SAFE
WORK SAFE
HOME SAFE**

Modern Slavery Statement

1. INTRODUCTION

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Lorne Stewart Plc to identify, prevent and manage the risks of modern slavery and human trafficking within our business and supply chains.

Lorne Stewart is committed to acting ethically and with integrity in all our business relationships and to taking appropriate and proportionate steps to prevent modern slavery within our operations and supply chains

2. OUR BUSINESS AND SUPPLY CHAINS

Lorne Stewart operates within the construction, engineering and facilities management sectors. Our activities involve working with a range of suppliers, subcontractors, labour providers and other business partners. We recognise that the nature of our operations and supply chains can create potential modern slavery risks, particularly where subcontracted or temporary labour is used and where goods or materials are sourced through extended supply chains.

We are committed to understanding these risks and focusing our controls and due diligence on the areas where the risk is considered greatest.

3. OUR POLICIES

Our Modern Slavery Policy sets out our zero-tolerance approach to modern slavery and human trafficking and applies to those working for or on behalf of the Company.

The policy sets out responsibilities for preventing, identifying and reporting concerns and is supported by other Company policies and procedures, including our:

- Supplier Code of Conduct
- Whistleblowing Policy
- recruitment and Right to Work procedures and
- procurement and supplier management processes.

Employees are encouraged to raise any concerns regarding suspected modern slavery at the earliest opportunity.

4. RISK ASSESSMENT AND MANAGEMENT

We recognise that modern slavery risks may vary depending upon the nature of the work, workforce, supplier, subcontractor, labour provider, material or sourcing arrangement.

Our approach is therefore based on identifying and prioritising areas of higher risk.

As part of strengthening this approach, the Company is developing and maintaining a business-wide modern slavery risk assessment, covering our core activities and relevant procurement categories.

Our risk management arrangements include:

- identifying suppliers, subcontractors and labour providers that may require enhanced due diligence
- identifying higher-risk materials and procurement categories using relevant sourcing and spend information
- considering modern slavery risks associated with labour providers and recruitment practices
- considering relevant subcontractors and higher-risk supply-chain tiers on major projects
- reviewing changes in our business and supply chains that may alter our modern slavery risk profile.

The overall risk assessment will be reviewed at least annually and where significant changes to our operations or supply chains occur.

5. DUE DILIGENCE

We continue to develop our due diligence processes to ensure that the level of scrutiny applied is proportionate to the level of risk identified.

This includes, where appropriate:

- screening and reviewing suppliers, subcontractors and labour providers
- enhanced due diligence for those identified as presenting a higher modern slavery risk
- reviewing labour providers' recruitment and employment practices
- considering modern slavery requirements when appointing and managing suppliers and subcontractors
- mapping relevant subcontractors and higher-risk supply-chain tiers on major projects;
- considering responsible procurement practices, including whether pricing, lead times, payment terms or other commercial practices could contribute to increased labour exploitation risk
- recording and monitoring corrective actions where concerns or weaknesses are identified.

Where an issue is identified, appropriate action will be determined according to the nature and severity of the concern. This may include further investigation, requiring corrective action and monitoring its completion, or reviewing the Company's relationship with the relevant supplier or organisation.

6. OUR OWN WORKFORCE

The Company operates recruitment and Right to Work procedures for individuals employed directly by Lorne Stewart Plc.

We recognise that particular attention may also be required where workers are supplied through agencies, labour providers or subcontracting arrangements.

As part of our risk-based approach, enhanced checks may therefore be undertaken in relation to labour providers, including consideration of their recruitment practices and the controls they have in place to prevent forced labour, exploitation and modern slavery.

7. TRAINING AND AWARENESS

We recognise that employees need to understand the indicators of modern slavery and know how to raise concerns.

Awareness of modern slavery forms part of our wider compliance arrangements, with appropriate training and guidance provided according to employees' roles and responsibilities.

Particular consideration is given to employees involved in procurement, recruitment, operational management and the appointment or management of suppliers, subcontractors and labour providers

8. MONITORING OUR EFFECTIVENESS

We recognise the importance of measuring the effectiveness of the steps we take rather than relying solely on policies and procedures.

The Company is developing and monitoring appropriate modern slavery performance measures, which may include:

- supplier and labour-provider screening
- enhanced due diligence undertaken
- completion of relevant training
- modern slavery concerns raised or identified
- corrective actions identified and completed
- improvements in supply-chain visibility and risk assessment.

Relevant measures will be reviewed periodically, with an overall review undertaken annually. Senior Management will also undertake an annual review of the Company's modern slavery risk profile, including relevant incidents or concerns, performance against agreed measures and any significant changes to the business or its supply chains.

9. CONTINUOUS IMPROVEMENT

We recognise that identifying and addressing modern slavery risk is an ongoing process.

During the next reporting period, we will continue to develop our approach, with particular focus on:

- maintaining a business-wide modern slavery risk assessment
- maintaining a register of higher-risk suppliers, subcontractors and labour providers
- identifying higher-risk materials and procurement categories
- strengthening labour-provider due diligence
- improving supply-chain visibility on major projects
- considering responsible procurement practices in higher-risk areas
- monitoring corrective actions
- developing appropriate KPIs to measure our effectiveness and progress

These measures will help us to focus our resources on the areas of greatest risk and support continuous improvement in our approach to preventing modern slavery.

10. REVIEW AND APPROVAL

This statement will be reviewed annually and updated where necessary to reflect changes in our business, supply chain, risk profile, legislation and our approach to preventing modern slavery.

This statement has been approved by the Board of Directors of Lorne Stewart Plc and is signed by a director on behalf of the company.

Signed:	
Name:	Mark Sutcliffe
Position:	CEO, Lorne Stewart Facilities Services
Date:	28 Sept 2026

For and on behalf of Lorne Stewart Plc