

## Modern Slavery and Human Trafficking Statement

At Lindum Group Limited (Lindum) we are committed to taking reasonable steps to ensure that modern slavery and human trafficking is not taking place within our Group or any of our supply chains, in accordance with the Modern Slavery Act 2015.

### ORGANISATIONAL STRUCTURE

At Lindum our primary business is construction, including new build, refurbishment and maintenance projects. We also have a range of 'in-house' and 'support services' including plant hire, vehicle maintenance, waste recycling and security. All of our 12 trading divisions operate through one single limited company, Lindum Group Limited.

We have Business Parks in Lincoln, Peterborough and York, a waste recycling site in Saxilby and various construction sites and building and maintenance projects live at any one time, usually within these immediate areas but occasionally further afield, always within the UK.

Lindum employs over 600 individuals directly, and also engages other professionals, sub-contractors and agency workers. Our subcontract and procurement teams work with suppliers who are where possible, local to us and based within the UK, with which we often have a long-term business relationship.

### OUR POLICIES

Lindum Group has established organisational systems and controls, overseen by senior management, to ensure that appropriate and coordinated action is taken throughout the business and that slavery and human trafficking is not taking place in our supply chains:

- With our direct employees, we continue to ensure that our recruitment processes are robust and transparent, ensuring identity documents are genuine and remaining vigilant to signs of forced labour.
- We believe respect for workers' rights are the foundation of decent work and we seek to be a good employer. Modern slavery is at the extreme end of the spectrum when it comes to labour standards, and we take seriously our duty to safeguard workers' rights and protections, ensure dignity and autonomy for all and prevent exploitation in all its forms.
- Our policies include our employee code of conduct, subcontract agreements, supplier code of conduct, recruitment (including prohibiting the use of worker-paid recruitment fees), and responsible purchasing practices. All workers are guaranteed the fundamental right to freedom to terminate employment; freedom of movement; freedom of association and collective bargaining. They also include prohibition of any threat of violence, harassment and intimidation; compulsory overtime; child labour; discrimination; confiscation of worker's original identification documents; and access to remedy and justice for victims of modern slavery.
- We have grievance mechanisms in place to ensure our employees and workers within our supply chain can raise concerns and make complaints, including a grievance procedure, public and non-employee complaints procedure and whistleblowing procedure. The Company will relay any concerns to a designated organisation or file a report to the Modern Slavery Helpline.

### TRAINING & AWARENESS

We have incorporated modern slavery and human trafficking into our training programme, with specific consideration for the ILO (International Labour Office) Indicators of Forced Labour. Whilst intended to help 'front line' criminal law enforcement, labour inspectors, trade union officers and NGO workers, the indicators represent the most common signs or clues of forced labour. The ILO's 11 indicators feature in our training and awareness initiatives (which are abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, and excessive overtime).

## **RISK ASSESSMENT & DUE DILIGENCE**

We acknowledge that statistically construction is one of the highest risk areas for labour abuse and modern slavery and despite our presence being limited in geographical hotspots, we know that these can happen anywhere.

*As a targeted response, we will be conducting social audits on our construction sites to check effectiveness of controls, by engaging directly with employees and other workers such as agency workers and subcontractors.*

We regularly review agreements we enter into with our supply chains to ensure that our commitment to the requirements of the Modern Slavery Act is clear, along with mutual contractual obligations and expectations. We perform due diligence onboarding checks, as well as ongoing engagement, as appropriate and we will continue to work with our supply chains to ensure, as far as we are able, that their processes and policies echo our commitment to comply with the requirements of the Act.

Where we have direct contact with workers, we can be vigilant to signs of abuse and forced labour. However, we acknowledge that our materials procurement supply chain involves greater distance from workers, especially where there are multiple supply chain tiers, in which case we rely heavily on supply chain assurance.

*To demonstrate our commitment to continuous improvement, we will be engaging with our procurement teams to provide bespoke training and review the effectiveness of our controls for assessing and auditing suppliers within our supply chain- especially where they may source materials and/or labour from outside the UK in countries that have lower human rights standards and higher rates of modern slavery and human trafficking.*

## **PROGRESS**

Following a comprehensive review during the last financial year, this report highlights a number of new focus areas and measures that we intend to take going forward. We remain committed to monitoring the latest trends, guidance and best practice to strengthen our efforts and ensure we take appropriate and proportionate steps to monitor and mitigate the risk of modern slavery and human trafficking within our organisation and the supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Lindum's Modern Slavery and Human Trafficking Statement for the financial year ending 30 November 2024.

  
**Robbie Kok, Director**  
**Lindum Group Limited**  
**Date: 19<sup>th</sup> May 2025**