



Anti-Slavery and Modern Slavery Policy

Responsible labour, ethical supply-chain control and prompt escalation.

 <p>No forced labour</p> <p>No forced labour, servitude, trafficking, child labour or exploitative practices.</p>	 <p>Supply-chain checks</p> <p>Suppliers and subcontractors are expected to work lawfully, fairly and transparently.</p>
 <p>Onboarding control</p> <p>Proportionate checks on identity, right to work, competence, insurance and payment routes.</p>	 <p>Report concerns</p> <p>Concerns about coercion, withheld wages or suspicious labour practices must be escalated.</p>

Supply chain assurance route

Clear requirements, proportionate checks, prompt escalation and documented action.



Company	Veraxus Ltd
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Version	1.0
Approval date	11 May 2026
Approved by	Alex Stefan, Director
Next review	11 May 2027, or earlier if required

This policy is deliberately practical and proportionate for a growing construction, refurbishment, flooring and package-delivery contractor. It supports tender submissions, subcontractor engagement and responsible project governance without overstating the scale of the business.

1. Purpose and legal alignment

Veraxus Ltd is committed to conducting business responsibly and with respect for human rights, lawful working practices and fair treatment. This policy sets out the company standard for preventing modern slavery, forced labour, servitude, human trafficking and exploitative labour practices within its own operations and supply chain.

The policy is aligned with the principles of the Modern Slavery Act 2015, UK Government transparency-in-supply-chains guidance, public-sector procurement expectations and the Government Supplier Code of Conduct. It is adopted as a responsible governance control and as supporting evidence for supplier registration, pre-qualification and tender submissions.

Proportionate position: Veraxus Ltd is not presenting itself as a large Section 54 reporting organisation. This is a voluntary company policy and control document, designed to show practical awareness and responsible management of labour and supply-chain risk.

2. Scope

This policy applies to directors, employees, workers, subcontractors, labour-only operatives, suppliers, consultants and any party working for or on behalf of Veraxus Ltd where relevant to company activity.

It applies across company offices, construction and refurbishment sites, live-environment projects, tender-stage engagement, procurement, subcontractor onboarding, supplier discussions and project delivery activities.




People covered	Activities covered	Expected standard
Directors, workers, subcontractors, labour-only operatives, suppliers and consultants	Construction, refurbishment, flooring, fit-out, procurement, site supervision and project administration	Lawful, fair, transparent and respectful working arrangements

3. Core commitments

- Act lawfully, ethically and professionally when engaging workers, subcontractors and suppliers.
- Avoid knowingly working with any person or organisation involved in forced labour, human trafficking or worker exploitation.
- Use clear terms, agreed rates, proper supervision and proportionate onboarding controls when engaging labour or subcontract support.
- Protect workers from intimidation, coercion, withheld pay, unsafe working arrangements or unacceptable treatment.
- Escalate suspicious circumstances and take proportionate action where concerns are identified.

4. Why this matters in construction

Construction and refurbishment work can involve layered subcontracting, changing labour arrangements, temporary labour needs, site-based accommodation and transport issues, and pressure to deliver quickly. These factors can make exploitation harder to identify unless practical controls are in place.

 <p>Labour chains</p> <p>Layered subcontracting can hide who is actually supplying labour and how workers are paid.</p>	 <p>Site visibility</p> <p>Fast-moving site environments require supervisors to notice behaviour, fatigue and control concerns.</p>	 <p>Payment control</p> <p>Unusual third-party control of wages, cards or deductions can indicate exploitation or coercion.</p>
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Veraxus Ltd will therefore apply proportionate checks and supervisory awareness, especially where labour-only resources, new subcontractors, rapid mobilisation, temporary teams or unfamiliar supply-chain routes are involved.

5. Supply chain and labour controls

Control area	Expected approach
Supplier and subcontractor selection	Consider capability, reliability, insurance, competence, lawful working practices and willingness to follow project requirements.
Labour-only support	Use known or checked resources where possible. Confirm identity, right to work, expected duties, supervision and payment route.
Wages and payment	Avoid arrangements that appear to involve withheld wages, excessive deductions, unexplained third-party payment control or coercive debt.
Site behaviour	Supervisors should remain alert to signs of coercion, intimidation, isolation, fear, fatigue, unsafe transport or inability to speak freely.
Accommodation and transport concerns	Where company activity identifies possible unsafe worker accommodation or exploitative transport arrangements, concerns should be escalated.

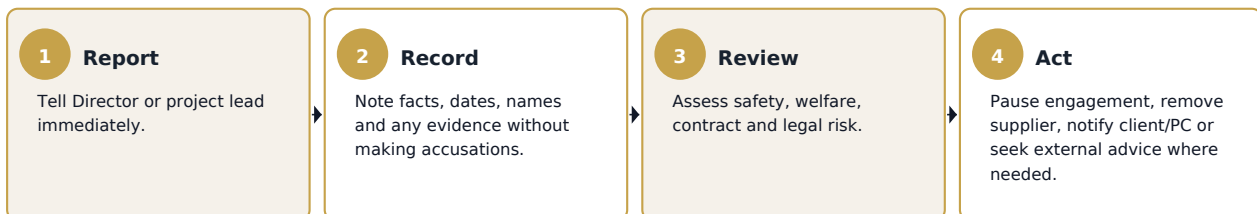
6. Warning signs

The following signs do not prove modern slavery on their own. They are indicators that should prompt curiosity, professional judgement and escalation.

Indicator	What may be seen on a project	Immediate response
Fear or control	Workers appear frightened, controlled by another person, unable to speak freely or unsure who they work for.	Speak privately where safe and escalate to the Director/project lead.
Document control	Identity documents, bank cards or wages appear to be controlled by another person.	Do not ignore. Record concern and seek guidance before continuing engagement.
Pay and debt concerns	Workers report excessive deductions, debt, withheld wages, threats or pressure to work.	Escalate promptly and consider pausing the labour route.
Supplier resistance	Supplier refuses reasonable questions about who is attending site, payment arrangements, competence or right-to-work evidence.	Do not proceed blindly. Seek clarification and document the issue.
Unusual pricing	Labour arrangement appears unusually cheap, informal or inconsistent with lawful working standards.	Check the basis of pricing, labour supply and supervision before appointment.

7. Reporting and response

Any concern should be reported to the Director or project lead as soon as possible. Concerns should be handled sensitively and proportionately, with confidentiality protected where appropriate and no retaliation against people raising concerns in good faith.



Emergency route: If a person appears to be in immediate danger, contact emergency services. If a potential modern slavery issue is identified in the UK, external reporting may include the police, the Gangmasters and Labour Abuse Authority or relevant project/client channels, depending on the circumstances.

8. Training, awareness and communication

Awareness will be communicated proportionately through onboarding, supplier and subcontractor instructions, site briefings, tender documents and management oversight. This does not mean Veraxus Ltd currently operates a large corporate training programme; it means expectations are clear, written down and reinforced in practical project management.

Route	Practical evidence Veraxus can hold
Subcontractor onboarding	Insurance evidence, basic capability checks, right-to-work route where applicable, contact details, payment route and scope confirmation.
Site briefing	Short toolbox talk or induction note explaining expected behaviour, concerns to report and who to contact.
Supplier communication	Email instruction, purchase/order terms or supplier note stating lawful labour and anti-exploitation expectations.
Management oversight	Director/project lead checks on site attendance, conduct, payment concerns and suspicious arrangements.

9. Tender and supplier wording

The following wording can be used in supplier questionnaires, PQQs and tender submissions where proportionate:

Veraxus Ltd has an Anti-Slavery and Modern Slavery Policy in place. The company does not tolerate forced labour, servitude, human trafficking, child labour or exploitative labour practices. Veraxus Ltd applies proportionate checks and management oversight when engaging workers, subcontractors and suppliers, and expects those working on its behalf to operate lawfully, fairly and transparently. Concerns are escalated promptly and managed through director-led review and appropriate action.

10. Monitoring and review

This policy will be reviewed annually or earlier if legal requirements, client expectations, supply-chain arrangements, project risk or operational circumstances materially change. Veraxus Ltd will update its approach as the company grows and as tender or client expectations develop.

11. Reference alignment

This policy has been prepared as a practical company control document, with light alignment to the following public sources and procurement expectations:

Reference	Reason for relevance
Modern Slavery Act 2015 and Section 54 transparency-in-supply-chain principles	Supports awareness of slavery, servitude, forced or compulsory labour, human trafficking and annual statement expectations for larger organisations.
UK Government transparency-in-supply-chains guidance	Sets out practical themes such as organisation and supply chains, policies, risk assessment, due diligence, training and effectiveness.
PPN 009 guidance on tackling modern slavery in government supply chains	Relevant to public-sector procurement and supplier management expectations, especially around forced or compulsory labour risk.
Government Supplier Code of Conduct	Supports standards of ethical behaviour, openness, transparency and good supply-chain conduct expected of government suppliers.

12. Declaration and electronic approval

Electronic approval and signature

This document has been electronically approved and signed by the Director of Veraxus Ltd. The typed signature below is intended to authenticate and approve this document on behalf of the company.

Company	Veraxus Ltd
Document status	Approved
Name	Alex Stefan
Position	Director
Signature	Alex Stefan
Date	11 May 2026
Next review	11 May 2027, or earlier if required

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