

Modern Slavery and Human Trafficking Statement

Introduction

Lancer Scott respect the human rights of our employees and those within our supply chain. We adopt a zero tolerance approach to modern slavery and human trafficking. We are committed to ensuring that slavery in all forms and human trafficking does not take place anywhere in our business or in any part of our supply chain.

In the event of any concerns being raised, irrespective of these being from within or outside of the business, all employees and Directors are required to act.

Our business

Lancer Scott are a construction and facilities management company headquartered in Bristol and with satellite offices from which we offer nationwide coverage. We do not consider our work to be seasonal in nature. Lancer Scott deliver project works predominantly as a management contractor as well as specializing in the delivery of hard services focused facilities management solutions. We are focused on providing high levels of customer satisfaction through long term client relationships.

Our Policies relating to Human Trafficking and Slavery

Lancer Scott have established policies and procedures that define how we conduct our business. Our policies include information, processes and required actions designed to specifically minimize the risk of slavery or human trafficking occurring within our business and/or our supply chain. These include:

- Our Ethical Trading Policy;
- Our Corporate Social Responsibility Policy;
- Our Whistleblowing Policy;
- Our Anti-Slavery and Anti-Trafficking Policy;
- Our Recruitment Process;
- Our Procurement Process;
- Our Employee Handbook.

Lancer Scott's Supply Chain

Lancer Scott's supply chain comprises large numbers of subcontracted contractors, suppliers and consultants to undertake works and provide services, materials or manufactured products on our construction sites and through our facilities management contracts.

We occasionally use temporary labour to support our operational requirements.

Lancer Scott implements and enforces processes to ensure, where practicable that the organisations within our supply chain understand and adhere to their obligations and our expectations with regard to their workforce and their respective supply chains. In addition to amending our own pre-qualification process, Lancer Scott also recognises and utilises the SafeContractor scheme to support this process.

Lancer Scott prides itself in building long term relationships with our suppliers, subcontractors and consultants and make clear our expectations of their business behaviour. Lancer Scott encourages the reporting of concerns and the protection of whistle blowers.

Supplier Adherence to Our Values

Lancer Scott have zero tolerance to human trafficking, we expect all those in our supply chain and contractors to comply with our policy and values regarding this.

Risk Assessment

As part of our compliance processes, we review our operations and supply chain to understand modern slavery risks associated with them. This review considers sector and industry risk, the products and services we procure directly and on behalf of clients, geographic risk and entity risk. Where concerns are raised, we complete an audit to assess compliance.

The key areas of risk within our supply chain are:

- Companies that employ temporary and/or low skilled labour;
- Companies that employ people on entry level wages;
- Manufacturing or trading in raw materials produced in non-UK/EU areas;
- Third party conduct risk.

Due Diligence

Where possible Lancer Scott builds long term relationships with our suppliers, subcontractors and consultants, making clear our expectations of their business behaviour. We endeavour to enforce our policies and procedures within our business and supply chain.

Our supplier onboarding questionnaire requires suppliers to provide a link to their latest statement or, if not a relevant organization, to provide relevant information so that we can review and confirm that they are committed to ensuring that slavery and human trafficking are not taking place within their own business and supply chain.

In extension of this Lancer Scott communicates the company's expectations with regard to modern slavery and human trafficking during site inductions for contractors and company inductions for employees. Lancer Scott also provides literature in its offices and site cabins highlighting the issues surrounding Modern Slavery and providing contact numbers for support agencies.

Where concerns are raised, we complete an audit to assess compliance. Any weakness identified under audit requires a detailed action plan to rectify. Failure by a supplier to comply with our requirements will result in removal from our supplier list.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All directors have been briefed on this subject. This is in addition to the induction briefings described above.

All managers are required to complete an e-learning module annually on Modern Slavery and Human Trafficking as part of our suite of e-learning modules. Completion is monitored via our company training matrix. This training provides understanding and identifies signs to look out for and what to do if they spot any of these signs.

Assessing our effectiveness

In line with our desire to continuously improve, we annually assess the effectiveness of our programme with the aim of identifying opportunities to improve the impact of our actions. The following activities assist us in assessing our effectiveness:

Reviewing and updating our policies and in particular our due diligence and risk assessment processes in response to changes in our business.

Reviewing the response to supplier onboarding questionnaires to identify opportunities for improvement.

Tracking metrics such as the number of suppliers who completed onboarding questionnaires and the number of resulting issues raised, training course completion rates, instances of non conformance under audit, reports of concerns raised and subsequent issues identified.

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the current financial year.

This policy was approved by the Board of Directors on the January 2025.



Morian Cooke, CEO

January 2025