



CROSSBUILD CONSTRUCTION SERVICES LTD

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Document Reference: CBS-MS&HT-001

Version: 1.0

Effective Date: 14/07/2026

Review Date: 14/07/2027

Policy Owner: Managing Director

1. Policy Statement

Crossbuild Construction Services Ltd has a zero-tolerance approach to modern slavery, human trafficking, forced labour and worker exploitation.

We are committed to ensuring that modern slavery does not occur within our business, workforce or supply chain.

We expect the same standards from our employees, subcontractors, labour providers, suppliers and other business partners.

Modern slavery risks are particularly relevant to construction because businesses can operate through complex labour and subcontracting arrangements. We will therefore take reasonable and proportionate steps to identify and manage these risks.

2. Scope

This policy applies to:

- Employees.
- Agency workers.
- Temporary workers.
- Subcontractors.
- Labour-only subcontractors.
- Suppliers.
- Consultants.

- Other business partners working for or on behalf of Crossbuild.

3. Prohibited Practices

Crossbuild will not tolerate:

- Forced or compulsory labour.
- Human trafficking.
- Slavery or servitude.
- Debt bondage.
- Child labour.
- Workers being threatened or coerced.
- Workers having identity documents unlawfully withheld.
- Workers being charged inappropriate recruitment fees.
- Exploitative working conditions.
- Unlawful withholding of wages.
- Deliberate exploitation of vulnerable workers.

4. Recruitment and Right to Work

Crossbuild will undertake appropriate checks to ensure that workers are legally entitled to work in the UK.

We will seek to ensure that recruitment is conducted fairly and transparently.

Where labour agencies are used, Crossbuild will take reasonable steps to ensure that those agencies operate lawfully and ethically.

5. Supply Chain and Subcontractors

Crossbuild will take a risk-based approach to subcontractor and supplier due diligence.

Depending on the level of risk, this may include:

- Company verification.
- Confirmation of registered business details.
- Review of policies.
- Right-to-work arrangements.

- Employment practices.
- Payment arrangements.
- Labour supply arrangements.
- Modern slavery questionnaires.
- Contractual requirements.
- Periodic monitoring.

Construction supply chains will be reviewed where appropriate for indicators of labour exploitation and fraud.

6. Reporting Concerns

Anyone working for or with Crossbuild is encouraged to report concerns regarding modern slavery.

Concerns can be reported to:

Managing Director: Dion McIntosh

Health & Safety Manager: Gary Evans

HR Contact: Jade McIntosh

No person will be penalised for raising a genuine concern in good faith.

7. Training and Awareness

Relevant employees and managers will receive appropriate information or training to help them:

- Understand modern slavery.
- Recognise warning signs.
- Understand their responsibilities.
- Raise concerns.
- Manage supply-chain risks.

8. Monitoring

Crossbuild will periodically review the effectiveness of this policy and associated procedures.

Relevant performance indicators may include:

- Number of subcontractors assessed.
- Number of labour providers assessed.
- Modern slavery training completed.
- Supplier due diligence completed.
- Concerns raised and resolved.
- Corrective actions completed.

9. Annual Statement

Where Crossbuild meets the legal requirements for publication of an annual modern slavery statement, it will prepare and publish the required statement.

The current statutory threshold is generally £36 million or more in annual worldwide turnover for organisations meeting the other criteria set out in Section 54 of the Modern Slavery Act 2015.

10. Review

This policy will be reviewed annually and following any significant change to our business, supply chain or applicable legislation.

Signed:



Managing Director: Dion McIntosh

Date: 14/07/2026

4. ANTI-BRIBERY & CORRUPTION POLICY

Document Reference: CBS-AB-001

Version: 1.0

Effective Date: 14/07/2026

Review Date: 14/07/2027

Policy Owner: Managing Director

1. Policy Statement

Crossbuild Construction Services Ltd is committed to conducting business honestly, ethically and transparently.

The company has zero tolerance for bribery and corruption.

No employee, director, subcontractor, supplier, consultant or other person acting on behalf of Crossbuild may offer, promise, give, request or accept a bribe.

Bribery is illegal under UK law and can expose individuals and businesses to serious criminal and financial consequences.

2. Scope

This policy applies to:

- Directors.
- Employees.
- Agency workers.
- Subcontractors.
- Consultants.
- Suppliers.
- Agents.
- Anyone acting on behalf of Crossbuild.

3. Bribery

Bribery includes offering, promising, giving, requesting or accepting something of value in order to improperly influence a person's actions or decision.

Examples may include:

- Cash payments.
- Gifts intended to influence a decision.
- Undisclosed commissions.
- Kickbacks.
- Free services.
- Excessive hospitality.
- Personal benefits.
- Payments made through third parties.

4. Gifts and Hospitality

Reasonable and proportionate hospitality may be acceptable where it is genuine, transparent and not intended to influence a business decision.

Employees must not accept or offer gifts or hospitality where doing so could create an obligation or appearance of improper influence.

Any significant gifts or hospitality must be disclosed to the managing director.

5. Conflicts of Interest

Employees must disclose any personal, financial or family interest that could conflict, or appear to conflict, with their responsibilities to Crossbuild.

Examples include:

- Selecting a supplier owned by a family member.
- Receiving personal benefits from a subcontractor.
- Having an undisclosed financial interest in a supplier.
- Awarding work in return for personal benefit.

6. Procurement and Tendering

All procurement and tendering decisions must be made fairly and based on legitimate commercial and operational considerations.

Employees must not manipulate tender processes or accept personal benefits in connection with procurement decisions.

7. Facilitation Payments

Crossbuild prohibits unofficial payments made to public officials or other persons to speed up or secure routine actions.

8. Third Parties

Crossbuild expects subcontractors, suppliers, consultants and other business partners acting on our behalf to comply with applicable anti-bribery legislation.

Appropriate due diligence may be undertaken depending on the risk associated with the relationship.

9. Reporting Concerns

Employees and business partners are encouraged to report suspected bribery or corruption.

Reports should be made to:

Managing Director: Dion McIntosh

Finance Director / Manager: Dion McIntosh

No employee will suffer retaliation for raising a genuine concern in good faith.

10. Training

Relevant employees will receive appropriate training and information regarding:

- Bribery risks.
- Gifts and hospitality.
- Conflicts of interest.
- Procurement.
- Reporting procedures.

11. Records

Crossbuild will maintain appropriate records relating to financial transactions, procurement decisions, gifts, hospitality and other relevant activities.

12. Monitoring and Review

The company will periodically review its bribery and corruption risks and the effectiveness of its controls.

This policy will be reviewed at least annually.

Signed:



Managing Director: Dion McIntosh

Date: 25/09/2026