

Modern Slavery and Ethical Trading Policy

Policy statement.

Darko Developments adopts a zero-tolerance approach to modern slavery, forced labour, servitude, human trafficking, debt bondage, withholding of wages, coercive recruitment, document retention, illegal working, and other severe labour exploitation. Darko is committed to acting ethically and with integrity in all business relationships and to implementing effective systems and controls designed to reduce the risk of exploitation in its own operations and supply chains. This policy applies to all employees, directors, agency workers, labour providers, subcontractors, suppliers and consultants, with heightened scrutiny for fit-out packages involving labour agencies, temporary labour, night work, hidden workplaces, hospitality and construction-site operations. Home Office guidance and government procurement guidance explicitly recognize construction, construction sites, hotels and restaurants as material risk environments.

Definitions. For Darko's purposes, "modern slavery" covers slavery, servitude, forced or compulsory labour and human trafficking. "Ethical trading" means lawful, fair and transparent labour practices, including lawful pay, lawful hours, freedom of movement, freedom of association where lawful, no worker-paid recruitment fees, proper right-to-work and identity checks, safe working conditions, and credible worker voice and remediation mechanisms. Government guidance also emphasizes that modern slavery exists on a continuum with other labour abuses and that risk assessment should focus on the risk to workers, not only reputation or commercial exposure.

Responsibilities, risk approach and due diligence

Darko should treat modern slavery as a board-level risk with operational ownership in commercial, procurement, project management and site supervision. That matches current government guidance, which expects policies, risk assessments, due diligence, training and monitoring to be embedded into management systems, and it reflects the construction-sector expectation that supply-chain risk is actively managed rather than left to annual policy statements.

The responsibility flow below is recommended because it mirrors government guidance on prevention, supply-chain mapping, incident response and remediation.

Board or Managing Director

Commercial and Procurement

Operations Director

Supplier Onboarding and Due Diligence

Project Managers

Site Supervisors

Subcontractors and Labour Providers

Workers and agency labour

Speak-Up / Incident Report / Welfare Concern

Remediation Plan

Audit / Suspension / Escalation

Fair Work Agency / Police / Helpline / Client

Board or Managing Director. Approves the policy, reviews the risk register quarterly, signs any annual statement or summary, and owns escalation where serious exploitation risk is identified.

Commercial and procurement staff. Must risk-rank suppliers, obtain policy and due-diligence documents, verify labour-provider controls, include contractual rights to audit and investigate, and keep records of approvals, audits and non-conformances.

Project managers and site supervisors. Must control access to site, verify onboarding, watch for signs of exploitation, make welfare checks, record concerns, and stop unsafe or suspicious work practices.

HR or people lead. Must oversee direct recruitment, right-to-work checks, worker documentation, and pathways for confidential concern raising.

Subcontractors and labour providers. Must comply with the policy, cascade requirements to their suppliers, cooperate with audits and worker interviews, and notify Darko immediately of any modern-slavery allegation, enforcement action or significant labour-rights breach.

Specific commitments and measurable objectives

Darko should commit to the following operating rules.

Darko will not knowingly use forced, trafficked or illegally working labour; will not permit worker-paid recruitment fees; will require proper right-to-work checks before work starts; will require payment at or above the applicable legal minimum; will prohibit retention of passports or identity documents except for lawful, short-lived verification with immediate return; and will require all agency and subcontract labour to have accessible welfare and reporting routes. These expectations are closely aligned with Home Office guidance, current CAS questions, right-to-work guidance and public procurement expectations.

Recommended measurable objectives are:

- **Risk mapping:** 100% of subcontractors and labour providers to be risk-rated before appointment.
- **Due diligence:** 100% of high-risk suppliers to complete a due-diligence questionnaire before start on site.
- **Contracting:** 100% of subcontracts to include anti-slavery clauses, audit rights and notification obligations.
- **Training:** 100% of managers, buyers and supervisors to complete annual modern slavery awareness training; 100% of workers to receive site induction covering reporting routes.
- **Worker voice:** visible reporting information on all sites and in welfare areas; multilingual information where needed.
- **Audit:** at least one documented due-diligence review for every high-risk supplier annually, with extra checks for labour providers and labour-only subcontractors.
- **Remediation:** every substantiated case to trigger a written corrective action plan, leadership review and lessons-learned review.

Again, these numeric thresholds are recommended management controls rather than statutory numbers.

Recruitment, labour sourcing and procurement practice

Darko's own recruitment and all labour sourcing should follow current Home Office right-to-work guidance, with checks completed before employment begins, clear identity matching, and follow-up checks where time-limited permission applies. For agency or gangmaster-style labour provision, Darko should verify the provider's status, ownership, references, complaints route, worker-

payment model and subcontracting chain. Public guidance now routes serious workplace abuse reporting through the Fair Work Agency, while the UK Modern Slavery & Exploitation Helpline and the police remain external routes for concerns.

High-risk indicators that should force enhanced diligence include: unusually low prices, labour-only supply, cash advances or unexplained deductions, gang labour, workers transported together by someone exerting control, reluctance to speak, poor language access, inconsistent identity documentation, hidden accommodation arrangements, excessive overtime, withheld pay, wage sharing with a third party, and labour in sectors or environments identified as higher risk such as construction, hospitality and site work. Government guidance also specifically recommends stronger audit quality, worker interviews and staff capacity-building on recruitment risks and debt bondage.

Where Darko uses supplier audits, they should not be reduced to desktop policy checks alone. Home Office guidance gives a construction-site example in which unannounced due diligence uncovered recruitment fees, missing right-to-work checks and wage diversion to a third party. Darko should therefore reserve the right to conduct announced or unannounced checks, confidential worker interviews, payroll sampling, ID/right-to-work checks, and accommodation or transport inquiries where lawful and proportionate.

Reporting, remediation and annual statement summary

Darko should require internal reporting through site supervisors, project managers, the people lead and a protected speak-up route. Every report should be triaged the same day, with risk grades for immediate danger, suspected exploitation, labour-rights breach, and concern requiring monitoring. If there is immediate risk of harm, call emergency services. If serious abuse or exploitation at work is suspected, report to the Fair Work Agency. For suspected modern slavery more broadly, report to the police and/or the Modern Slavery Helpline. Government guidance also supports an approach in which the safest outcome for workers is prioritised and contract termination is treated as a last resort after considering remediation and worker impact.

Darko should publish a short annual **Modern Slavery Statement Summary** whether voluntary or mandatory. If Darko reaches the legal threshold, it should publish a full section 54 statement for each financial year, place it prominently on the website, and consider use of the government statement registry. Current guidance says organisations are legally required to publish a statement for each financial year, should normally do so within six months of year end, and are strongly encouraged to publish to the registry.

Sample contract clause and tender wording

The following sample clause is designed to align with section 54 practice, public procurement expectations, and CAS V5 evidence requirements.

Modern Slavery and Ethical Trading

The Subcontractor warrants that neither it nor, so far as it is aware following reasonable due diligence, any person in its supply chain engaged on the Works engages in slavery, servitude, forced or compulsory labour, human trafficking, worker-paid recruitment fees, unlawful withholding of wages, unlawful retention of identity documents, or illegal working. The Subcontractor shall comply with the Modern Slavery Act 2015 and Darko Developments' Modern Slavery & Ethical Trading Policy, maintain equivalent internal controls, and cascade materially equivalent obligations through its supply chain. The Subcontractor shall provide policies, statements, training records, right-to-work controls, payroll evidence and due-diligence information on request; permit worker interviews and reasonable audits; and notify Darko immediately of any allegation, investigation, enforcement action or material breach. Darko may require remedial action plans, suspend work, remove personnel from site, or terminate for serious or repeated breach.

Darko Developments operates a zero-tolerance approach to modern slavery and labour exploitation. We apply risk-based due diligence to our supply chain, including labour providers and subcontractors, and we require equivalent anti-slavery commitments through our subcontract terms. Our controls include supplier onboarding checks, right-to-work verification, worker induction, visible reporting routes, manager and supervisor training, and corrective-action procedures where any risk or breach is identified. Where legally required, we publish an annual modern slavery statement; where not legally required, we maintain equivalent policy and reporting controls.

Tender quick-reference summary

The summary below is written as a one-page-style set of attachments and messages for a typical public or principal-contractor tender. It is designed around the common asks found in the Standard Selection Questionnaire, modern-slavery procurement guidance and CAS-based prequalification.

Submission item	What Darko should say	Evidence to attach now
EDI Policy	Darko has a board-approved EDI/FIR policy covering recruitment, employment, subcontractor conduct, harassment prevention, reasonable adjustments, grievance and speak-up.	Signed policy PDF, review date, training matrix, induction slide or handbook extract.
Sexual-harassment prevention	Darko takes proactive steps to prevent sexual harassment, including risks from third parties on sites and at client premises.	Anti-harassment procedure, risk assessment note, training attendance, reporting route poster.
Whistleblowing / speak-up	Darko protects workers raising concerns and provides confidential reporting channels.	Whistleblowing policy, named contact, route map, recent communication evidence.
Modern Slavery & Ethical Trading Policy	Darko operates risk-based due diligence and zero tolerance for exploitation.	Signed policy PDF, supplier due-diligence form, contract clause, induction notice.
Modern slavery statement or equivalent	If in scope, Darko publishes a compliant section 54 statement; if not, Darko provides an equivalent summary document.	Latest statement or one-page summary, website link if available, review date.
Supply-chain controls	Darko screens subcontractors and labour providers for EDI and labour-rights compliance before appointment.	Supplier questionnaire, subcontractor declaration, audit plan, corrective action template.
Recruitment and right to work	Darko recruits on merit, applies lawful checks, and does not charge recruitment fees to workers.	Recruitment procedure, right-to-work checklist, agency labour controls.
Monitoring and KPIs	Darko reviews policy effectiveness and supply-chain compliance at leadership level.	KPI dashboard template, annual review calendar,

Submission item	What Darko should say	Evidence to attach now
		management meeting agenda extract.

A concise tender note that works well in portals is: **“Darko Developments maintains current EDI and Modern Slavery policies, flows these requirements through subcontract terms, trains managers and site supervisors annually, and monitors compliance through onboarding, induction, investigation, corrective-action and leadership review processes.”**

Evidence required by common procurement routes

The comparison below synthesises the highest-confidence public information available. Constructionline and CHAS are both now operating in the Common Assessment Standard ecosystem; local authorities typically combine the Standard Selection Questionnaire with project-specific questions; and publicly available material on **Supply2** describes it mainly as a portal or advertising interface rather than a single compliance accreditation framework, so documentary asks are typically buyer-led rather than centralised.

Route	Typical required evidence	What Darko should upload	Practical note
Constructionline Gold / Platinum	CAS V5 evidence on FIR/EDI, anti-slavery communication, whistleblowing, right to work, NMW, and sexual-harassment prevention; annual review and communication evidence are now explicit.	EDI/FIR policy, anti-harassment arrangements, whistleblowing policy, anti-slavery policy/statement, workforce communication evidence, right-to-work process, training records.	Gold/Platinum buyers will expect policy and evidence of communication/implementation, not just a PDF.
CHAS / CAS route	CAS-based annual evidence across risk-management areas, including equality/fairness and modern slavery where relevant.	Same bundle as above, plus any site-based implementation evidence if requested.	Keep one master compliance pack so the same documents can serve both CHAS and Constructionline.

Route	Typical required evidence	What Darko should upload	Practical note
Supply2 / buyer-hosted portal	Usually buyer-specific SQ/PSQ responses and attachments rather than a uniform accreditation standard.	Short portal-ready PDFs: EDI policy, modern slavery policy/statement summary, whistleblowing, right-to-work, supplier due-diligence form, training summary.	Assume the portal is only the container; the legal and evidential asks will come from the buyer's tender documents.
Local authorities and other public buyers	Standard Selection Questionnaire, project-specific questions, social-value responses, modern-slavery statement or equivalent, EDI policy, contract clauses, and sometimes high-risk supplier due diligence and MSAT-informed oversight.	EDI policy, modern slavery policy/statement summary, whistleblowing, grievance route, contract clause set, supply-chain due-diligence checklist, KPI template.	Construction and fit-out work for councils is often in a higher-risk spend category, so expect closer scrutiny of labour sourcing and subcontracting.

Implementation roadmap, training and templates

Scalable operating model

Because Darko's size is unspecified, the policy system should scale rather than over-engineer.

Company size	Governance model	Minimum practical setup
Micro	Owner-director signs both policies and acts as policy owner.	One simple EDI policy, one modern-slavery policy, one grievance/speak-up route, one supplier checklist, one annual review meeting.
Small	Managing Director owns policy; one named people/compliance coordinator keeps records.	Add formal training log, supplier risk ratings, quarterly KPI review and incident tracker.
Medium	Board sponsor plus named HR/compliance and commercial leads.	Add audit plan, manager refresher training, annual supply-chain review, and formal annual statement summary.

Suggested training modules

Darko's training plan should include a short induction module for all workers and fuller annual modules for managers, recruiters, commercial staff and supervisors. Recommended modules are:

- **EDI and respect at work induction:** protected characteristics, site conduct, bullying/harassment, reporting routes.
- **Sexual-harassment prevention for managers and supervisors:** risk assessment, third-party risks, response expectations.
- **Reasonable adjustments and inclusive recruitment:** recruitment-stage adjustments, workplace support, objective selection.
- **Whistleblowing and grievance handling:** protected disclosures, confidentiality, detriment, Acas basics.
- **Modern slavery awareness:** warning signs, do's and don'ts, welfare-first response, external reporting routes.
- **Right-to-work and labour-provider controls:** current Home Office checks, follow-up checks, document handling.

- **Supply-chain due diligence:** risk ranking, supplier questionnaires, site verification, remediation planning.
- **Buyer-facing tender training:** how to evidence EDI, social value and anti-slavery controls in bids.

These recommendations follow the free or authoritative resources currently highlighted by the Supply Chain Sustainability School FIR programme, Home Office modern slavery training page, EHRC guidance, Acas guidance, and current right-to-work guidance.

Templates

EDI action plan template

Action	Owner	Deadline	Measure of success	Status
Review policy and approve annually	Managing Director	[date]	Signed policy with review date	
Refresh recruitment template and interview scoring	HR / Hiring manager	[date]	All roles use standard scoring	
Update induction slides and site briefings	Operations	[date]	100% of starters inducted	
Train managers and supervisors	People lead	[date]	Training completion rate	
Review grievances and speak-up data quarterly	MD / People lead	[date]	Dashboard produced	
Extend EDI requirements to subcontractors	Commercial	[date]	Clause in all new subcontracts	

Supplier due-diligence checklist

Check	Yes / No	Evidence seen	Risk note
Current EDI/FIR policy or written equivalent			
Current modern slavery policy/statement or equivalent			
Whistleblowing / grievance route			

Check	Yes / No	Evidence seen	Risk note
Right-to-work procedure			
Pays legal minimum wage			
No worker-paid recruitment fees			
Subcontracting or labour-provider chain disclosed			
Recent tribunal / regulator findings declared			
Training evidence for supervisors or managers			
Audit or site-visit required			

Incident report template

Field	Detail
Date and time	
Project / site	
Reported by	
Person(s) at risk	
Concern type	EDI / harassment / whistleblowing / labour exploitation / modern slavery / other
What happened	
Immediate safety action taken	
Witnesses / evidence	
Escalated to	
External report made	Police / Fair Work Agency / Helpline / Client / none
Corrective action required	
Review date and close-out	

Modern slavery statement summary template

Heading	Draft content prompt
Organisation and supply chain	What Darko does, where it works, key labour and material supply chains
Policy framework	List EDI, whistleblowing, recruitment, H&S and anti-slavery controls
Risk assessment	Identify high-risk packages, agencies, sectors and project types
Due diligence	Explain onboarding, right-to-work, questionnaires, audits and worker interviews
Training	State who is trained and how often
Monitoring and KPIs	State dashboard metrics and annual review arrangements
Incidents and remediation	Summarise any incidents and what changed
Approval	State approver, date and next review date

Recommended next steps

Darko should next convert this report into four short, signed PDF documents for tender use: the EDI Policy, the Modern Slavery & Ethical Trading Policy, a whistleblowing procedure, and a one-page annual statement summary. It should then update subcontract terms, create the supplier due-diligence checklist, and produce a simple compliance pack containing review dates, training records, induction extracts and reporting-route posters. Those are the evidence points most likely to be requested through CAS-based routes and public-sector selection questionnaires.

Open questions and limitations

The company's exact legal entity, turnover, workforce size and current accreditation status were not specified, so this report uses scalable options rather than assuming a mandatory section 54 reporting duty or a full HR department. The "Supply2" row is intentionally cautious because publicly available material describes Supply2 mainly as a portal/advertising interface rather than a current, standardised compliance scheme; in practice, buyer-issued SQ/PSQ documents will control the exact evidence ask. If Darko is already a Constructionline Gold/Platinum or CHAS CAS supplier, the final document set should be checked against the most recent portal question wording before upload.