

MODERN SLAVERY POLICY

Choppingbloc — www.choppingbloc.co.uk

Last updated: 23/01/2026

1) Purpose

This Policy sets out how we prevent, identify and respond to modern slavery and human trafficking risks in our own operations and supply chains. We adopt the principles of section 54 of the Modern Slavery Act 2015, even though small businesses below the legal turnover threshold may not be legally required to publish an annual statement.

Section 54 requires commercial organisations supplying goods or services and meeting a prescribed turnover to produce an annual slavery and human trafficking statement; the prescribed amount is currently £36 million. We follow the same good-practice framework on a voluntary basis.

2) Scope & definitions

This Policy applies to all employees, workers, subcontractors and suppliers engaged by or on behalf of Choppingbloc. 'Modern slavery' includes slavery, servitude, forced or compulsory labour and human trafficking as defined in the Modern Slavery Act 2015 and Home Office statutory guidance.

3) Our business & supply chains

Choppingbloc designs, makes and installs products and provides related services on customers' sites in the UK. Our supply chain primarily consists of UK-based merchants and traders providing materials, tools, fixings, transport and occasional subcontract labour. We recognise sector risks can arise in raw materials, logistics and labour provision, including temporary labour.

4) Legal & guidance framework

- Modern Slavery Act 2015, s.54 'Transparency in supply chains'.
- The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 which set the £36m turnover threshold.
- Home Office 'Transparency in supply chains: a practical guide', which describes six recommended reporting areas: structure, policies, due diligence, risk assessment/management, effectiveness (KPIs) and training.

- Home Office statutory guidance on identifying and supporting victims.

5) Roles & responsibilities

- The Owner/Director is accountable for implementation and annual review of this Policy and for approving any modern slavery statement we voluntarily publish.
- Supervisors and project leads must apply this Policy when engaging labour and suppliers.
- All workers must report concerns promptly via the channels in Section 10.

6) Risk assessment

We review risks at least annually and when onboarding new suppliers or subcontractors, focusing on: (i) labour recruitment (including any use of labour providers), (ii) higher-risk materials or countries of origin, and (iii) logistics and on-site working. We prioritise proportionate controls and continuous improvement consistent with Home Office guidance.

7) Supplier standards & due diligence

7.1 Minimum standards. We expect suppliers and subcontractors to: (a) prohibit forced, bonded or involuntary labour; (b) prohibit worker-paid recruitment fees; (c) provide fair terms, wages and working hours; (d) allow workers to retain identity documents; (e) enable confidential reporting and cooperation with investigations.

7.2 Onboarding. New suppliers/subcontractors must confirm acceptance of this Policy (or provide an equivalent) and disclose their own modern slavery policies and controls where available.

7.3 Proportionate checks. For higher-risk engagements we may request additional information (e.g., labour recruitment practices, country-of-origin transparency for key materials) or conduct site visits.

7.4 Contract terms. Our purchase orders/subcontracts may include modern slavery clauses, audit/cooperation obligations and remediation requirements.

8) Recruitment & employment practices

We do not use child labour. We conduct right-to-work checks for all employees in line with Home Office guidance; we do not charge recruitment fees and we never require deposits or withhold passports. We ensure that wage deductions and overtime are lawful and transparent. Where labour providers are used, we require them to meet equivalent standards.

9) Training & awareness

We provide proportionate training/briefings to staff involved in procurement, recruitment and site supervision to help them recognise indicators of modern slavery and know how to escalate concerns, consistent with Home Office guidance.

10) Reporting concerns & whistleblowing

Anyone can raise a concern in confidence by emailing enquiries@choppingbloc.co.uk. Employees may also speak to a manager. We take all reports seriously, investigate promptly and will not tolerate victimisation of reporters. Where appropriate we will refer matters to law enforcement or specialist agencies.

11) Response, remediation & escalation

If we identify modern slavery in our operations or supply chain, our priorities are to protect affected workers, work with competent authorities and implement remediation. We will engage with the supplier to produce a time-bound corrective action plan; where cooperation is not forthcoming or harm persists, we may suspend or terminate the relationship. We will capture lessons learned to strengthen controls.

12) Measuring effectiveness (KPIs)

We track: (i) completion of risk reviews for new higher-risk suppliers; (ii) percentage of staff in scope who received training; (iii) number and resolution of reports; and (iv) audit/spot-check outcomes. We review results annually and update actions accordingly.

13) Voluntary statement & registry (if applicable)

If we choose to publish an annual modern slavery statement, it will be approved by the Owner/Director, signed and placed in a prominent location on our website. We may also add it to the UK Government Modern Slavery Statement Registry on a voluntary basis. As best practice, statements should be updated annually and published within six months of the financial year-end.

14) Governance, review & approval

This Policy is reviewed at least annually and whenever there are significant changes in our operations or law/guidance. Approval: [Name/Title], signed: Connor Lowe, date: 23/01/2026.