

### MODERN SLAVERY & HUMAN TRAFFICKING POLICY

#### ***Introduction***

JF & H Dowds trading as Dowds Group remains fully committed to upholding the principles of the Modern Slavery Act 2015 and ensuring that slavery, servitude, forced or compulsory labour, and human trafficking play no part in our business operations or supply chain. We adopt a zero-tolerance approach and require the same high standards from all employees, suppliers, subcontractors, and partners.

This policy applies to all companies within the Dowds Group and all individuals working for or on behalf of us, at any level.

#### ***Organisation Structure***

Dowds Electrical (Holdings) Limited is the parent company of Dowds Group, an independent, family-owned building services engineering company employing approximately 200 people. We deliver mechanical, electrical and public-health (MEP) services, decarbonisation and energy solutions, facilities management, life-cycle modelling, and circular-economy driven projects throughout the UK and Ireland.

We operate a multi-tiered supply chain comprising specialist subcontractors, labour providers, material suppliers, plant and equipment suppliers, design partners, and manufacturers. We recognise that visibility becomes more limited deeper into the supply chain, and we therefore apply a proportionate and risk-based approach to supply chain management.

#### ***Policy Commitments***

Dowds Group maintains a zero-tolerance stance on modern slavery and human trafficking. Our commitments include:

- Ensuring that modern slavery is not present in our operations or supply chain.
- Upholding ethical conduct in all commercial relationships.
- Requiring all suppliers to comply with the Modern Slavery Act 2015.
- Providing mechanisms for staff and suppliers to report concerns without fear of retaliation.
- Continuous improvement in line with legislation, guidance, and best practice.

This policy works alongside the following internal policies:

- Whistleblowing Policy
- Code of Conduct – Company handbook
- Ethical Procurement and Supply Chain Policy
- Anti-Bribery & Corruption Policy
- Recruitment and Right-to-Work Procedures

- Health & Safety and Safeguarding Procedures

### ***Due Diligence Processes***

Dowds Group uses a structured approach to identifying, preventing, and mitigating modern slavery risks.

Key due-diligence processes include:

- Supplier and subcontractor prequalification through our IF31 Supplier Assessment process, requiring confirmation of Modern Slavery Act compliance.
- Annual renewal of compliance statements for all suppliers (excluding sole traders/microbusinesses where the Act does not apply).
- Contractual clauses requiring continuous legal compliance and immediate notification of any breaches.
- Removal from the Approved Supplier List where non-compliance or unethical practice is identified.
- Whistleblowing mechanisms enabling staff and supply chain partners to raise concerns confidentially.

### ***Risk Assessment and Risk Management***

We recognise that certain parts of our business and supply chain may present a higher risk of modern slavery. These include:

- Labour-intensive subcontracted work
- Tier 2 and Tier 3 suppliers involved in manufacturing or assembly
- Products sourced internationally (e.g., electrical components, PV modules, raw materials)
- Temporary labour or recruitment supply
- Sectors or geographic areas with known modern slavery prevalence

To manage these risks we:

- Conduct risk-ranking based on geography, labour profile, and product/service category.
- Require higher-risk suppliers to provide additional documentation (e.g., ethical audits, labour standards certifications, supply chain mapping).
- Review risk areas during annual supplier evaluations.
- Increase monitoring of suppliers operating in high-risk categories.
- Work with suppliers to improve labour standards or, if necessary, terminate relationships.

### ***Measuring Effectiveness***

We measure the effectiveness of our approach through a number of Key Performance Indicators (KPIs):

- 100% of new suppliers (excluding sole traders/microbusinesses) must confirm compliance with the Modern Slavery Act prior to onboarding.
- 100% annual reconfirmation of compliance for existing suppliers.
- Zero reported incidents of modern slavery within our organisation or supply chain.
- Completion rates for staff training and awareness sessions.
- Proportion of high-risk suppliers subjected to enhanced due diligence.
- Number of whistleblowing reports escalated and resolved.

These KPIs are reviewed annually by the Board.

### ***Training and Capacity Building***

Dowds Group recognises that raising awareness is a critical part of preventing modern slavery. We therefore:

- Provide modern slavery awareness training to procurement teams, site management, HR staff and other employees with supply chain responsibilities.
- Include modern slavery guidance in induction training for all new staff.
- Deliver updates through toolbox talks, internal communications, and annual compliance refreshers.
- Ensure managers and procurement staff understand how to recognise signs of exploitation and how to escalate concerns internally.

### ***Reporting Concerns***

Any employee, supplier or subcontractor may report concerns confidentially through our Whistleblowing Policy. Concerns are investigated promptly, and any confirmed breach will result in disciplinary action, contract termination, and, where relevant, referral to authorities.

### ***Approval and Review***

This policy is reviewed annually or sooner if significant changes occur in legislation, organisational structure, or risk profile. It is approved by the Dowds Group Board of Directors.

**Signed:**



**Print Name:**

Louise McClelland

**Position:**

Chief Executive Officer

**Date:**

27/06/2025