

Procedures Manual	Lowery Group Limited
Ref:	HR-PO-16
Issue:	6
Date:	February 2026

Lowery Group - Modern Slavery and Human Trafficking Policy

	Name	Role	Signature	Date Signed
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REVISION RECORD

Issue:	Date:	Comments:
1	January 2021	First issue document. Created as a standalone Company policy
2	January 2022	Annual review completed. Document reviewers updated on front page.
3	January 2023	Updated to Lowery Group Policy.
4	January 2024	Reviewed and reference to Grievance Procedure replaced with Resolutions procedure.
5	February 2025	Annual review completed. No material changes.
6	February 2026	Policy condensed .



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REFERENCES, ABBREVIATIONS & DEFINITIONS

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1. Modern Slavery And Human Trafficking Policy Statement

Lowery Group Limited is committed with being a sustainable business in line with our Sustainability Policy which establishes sustainable procurement and Modern Slavery as a key focus area.

We recognise that modern slavery and human trafficking are violations of fundamental human rights and are contrary to the Modern Slavery Act 2015. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Company has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any part of our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015, Company Policy HR-PO-11 Ethical Procurement, and fundamental human rights as set out by the principles of the International Labour Organisation and the United Nations Guiding Principles.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

2. Legal Context

Whilst Lowery Ltd is not legally required to publish a Modern Slavery Statement under section 54 of the Modern Slavery Act 2015 due to our size, we recognise our responsibility to take reasonable and proportionate steps to prevent modern slavery

3. Scope

This policy applies to:

- All employees, workers, agency staff, and contractors
- All suppliers, subcontractors, and business partners
- All business activities carried out by or on behalf of Lowery Ltd

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4. Responsibility for the policy

The Company Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Overall responsibility for this policy sits with senior management.

All employees share responsibility for preventing modern slavery by remaining alert and reporting concerns.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Persons working on behalf of Lowery Group Limited are invited to comment on this policy and suggest ways in which it might be improved.

5. Our Commitment

We will:

- Treat all workers fairly and with dignity
 - Ensure employment is freely chosen
 - Pay at least the National Minimum Wage or National Living Wage
 - Comply with UK employment and health & safety laws
 - Not tolerate child labour, forced labour, or human trafficking
 - Encouraged all to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage
- Where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
 - If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director.
 - We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

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- Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us,

6. Recruitment and Employment

We ensure that:

- All workers have the legal right to work in the UK
- Recruitment processes are transparent and fair
- Workers are not charged recruitment fees
- Identity checks and right-to-work checks are carried out lawfully

7. Supply Chain and Contractors

We expect our suppliers and subcontractors to:

- Comply with UK employment law and the Modern Slavery Act 2015
- Not use forced, bonded, or trafficked labour
- Allow us to raise concerns where risks are identified
- We take a proportionate, risk-based approach when engaging suppliers.
- Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

8. Reporting Concerns

All workers and business partners are encouraged to report concerns relating to modern slavery or unethical practices. Reports can be made confidentially and without fear of retaliation to:

- A line manager, or
- Company management
- Anonymous reporting can also be made through the Confidential Incident Reporting and Analysis System (CIRAS)