

SLAVERY & HUMAN TRAFFICKING POLICY

(Modern Slavery Act 2015 Statement)

Introduction from the Managing Director

Slavery and human trafficking remain serious global issues and can occur in many forms, including forced labour, bonded labour, child labour and exploitation. Although the risk within our direct operations is considered low, we recognise our responsibility to remain vigilant and to take steps to prevent modern slavery and human trafficking within our business and supply chains.

General & Technical Flooring Services Ltd (“the Company”) is committed to acting ethically and with integrity in all business relationships. We are committed to implementing effective systems and controls to ensure that slavery and human trafficking do not take place in any part of our business or supply chains.

All employees are expected to be alert to potential risks and concerns, and management is expected to act promptly and decisively where concerns are raised.

1. Organisation Structure

The Company is a commercial flooring contractor operating primarily within the UK construction sector.

- Head Office: Aberdeen
- Regional Office: Livingston
- Annual Turnover: circa £6,000,000

2. Our Business

The Company operates through two business units split geographically, delivering flooring installation and associated services across commercial, education, healthcare and public sector projects.

3. Our Supply Chains

Our supply chains primarily involve:

- Directly employed labour
- Approved subcontractors and labour-only subcontractors
- UK-based suppliers of flooring materials, adhesives and associated products

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Given the nature of our business, supply chains are predominantly UK-based and short in length, which reduces exposure to higher-risk regions. A number of our suppliers are client specified therefore we have to use them.

4. Our Policy on Slavery and Human Trafficking

The Company has a **zero-tolerance approach** to modern slavery and human trafficking.

We are committed to:

- Preventing slavery and human trafficking in our operations and supply chains
- Acting ethically and with integrity in all business dealings
- Ensuring transparency and accountability throughout our business
- Complying fully with the **Modern Slavery Act 2015**

This policy applies to all employees, subcontractors, suppliers and other business partners.

5. Due Diligence Processes

To identify and mitigate the risk of modern slavery, the Company:

- Undertakes projects using directly employed staff or **trusted and approved subcontractors**
 - Builds long-standing relationships with local suppliers and subcontractors where possible
 - Communicates clear expectations regarding ethical behaviour and labour standards
 - Requires subcontractors and suppliers to comply with all applicable employment and immigration laws
 - Maintains systems to encourage reporting of concerns, including whistleblowing protections
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6. Supplier and Subcontractor Adherence

We expect all suppliers, employment agencies and subcontractors to:

- Comply with this policy and all relevant legislation
- Maintain their own controls to prevent slavery and human trafficking
- Cooperate with any reasonable requests for information or audits

Senior Management is responsible for ensuring compliance within their respective areas and for managing supplier and subcontractor relationships in line with this policy.

7. Training and Awareness

To ensure appropriate awareness:

- Relevant staff receive guidance and training on identifying and reporting modern slavery risks
 - Directors and senior management are briefed on responsibilities under the Modern Slavery Act 2015
 - Managers are responsible for reinforcing awareness within their teams
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8. Effectiveness and Monitoring

The Company uses the following measures to assess the effectiveness of its approach:

- Accurate completion of **Right to Work in the UK** checks at recruitment stage
 - Ongoing monitoring of employees with time-limited leave to remain
 - Regular engagement with subcontractors and suppliers regarding compliance expectations
 - Review of any concerns or incidents raised and actions taken
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9. Reporting Concerns

Any employee or worker who has concerns about suspected modern slavery or human trafficking is encouraged to report this immediately to management or via the Company's whistleblowing procedure.

All reports will be taken seriously, investigated appropriately, and treated confidentially. No individual will suffer detrimental treatment for raising a concern in good faith.

10. Review and Approval

This policy and statement are reviewed annually and updated as necessary to reflect changes in legislation, guidance or business operations.

SIGNED
J.MORRISON (MD) 10/02/2026



DATE	REVISION	DETAIL	PREPARED BY	APPROVED BY
July 2020	A	New Background	John Morrison	John Morrison
November 2021	B	Tidy up only	John Morrison	John Morrison
November 2022	B	Annual review	John Dunn	John Morrison
February 2026	C	Improvements and updated	John Morrison	