Modern Slavery Policy

Spacemaker Developments Ltd

Policy Reference	SMD-PL-036
Version	2.0
Effective Date	06 April 2026
Status	Active

Collaborate. Construct. Inspire.

Applies to	All employees, contractors, and supply chain partners of SMD Ltd

Legal requirement	Under s.54 of the Modern Slavery Act 2015, SMD Ltd is required to publish an annual transparency statement approved by the board and signed by a director.

1. Our Commitment

SMD Ltd has a zero-tolerance approach to modern slavery and human trafficking in all its forms. We are committed to acting ethically in all our business relationships and to implementing effective systems and controls to ensure slavery and trafficking do not take place in our business or supply chain.

2. What is Modern Slavery?

Modern slavery encompasses slavery, servitude, forced and compulsory labour, and human trafficking. In the construction sector, risks include: exploitation of migrant workers on site; gang-master labour supply chains; tied accommodation with unlawful wage deductions; document confiscation; and debt bondage.

3. Our Supply Chain

SMD requires all suppliers and subcontractors to comply with this policy and expects equivalent standards throughout the supply chain. We will not work with organisations that engage in or facilitate modern slavery. We conduct due diligence on key suppliers and reserve the right to terminate any contract where modern slavery concerns are identified. See also the Supply Chain & Procurement Policy (SMD-PL-037).

4. Due Diligence

Our due diligence process includes: pre-qualification checks on key subcontractors; review of labour supply arrangements, particularly where migrant workers are involved; site-level checks to identify signs of exploitation; and contractual requirements for subcontractors to confirm compliance.

5. Reporting Concerns

If you suspect modern slavery in SMD's operations or supply chain, report your concern to a Director immediately. You may also contact the police (999 in an emergency, 101 otherwise) or the Modern Slavery Helpline (0800 0121 700). Reporting in good faith is protected under the Whistleblowing Policy (SMD-PL-007).

6. Training

Relevant employees — particularly those in site management and procurement — receive training on recognising the signs of modern slavery and the action to take.

7. Transparency Statement

SMD publishes an annual Modern Slavery Transparency Statement under s.54 of the Modern Slavery Act 2015. A copy is available on request from a Director.

8. Related Documents

- Supply Chain & Procurement Policy (SMD-PL-037)
- Whistleblowing Policy (SMD-PL-007)
- Anti-Bribery, Fraud & Corruption Policy (SMD-PL-035)

9. Review

This policy will be reviewed annually. Next scheduled review: April 2027.

Signatures

This policy is signed by the Directors of Spacemaker Developments Ltd.

Moomith Ullah
Director of Operations

Stephen Owens
Director

Robert Millward
Director

Date reviewed:

16.04.26