linear group

POL-MS-1010

MODERN SLAVERY

Policy





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Introduction

Linear UK Group Ltd remains committed to meeting the requirements of the Modern Slavery Act 2015 and preventing modern slavery in all our company activities, and ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking. We recognise that slavery and human trafficking remains a hidden affliction on our society. We all have a responsibility to be vigilant to the risks, however small, in our business and in the wider supply chain. We have a zero-tolerance to this issue and expect our people, suppliers and sub-contractors to comply with our values. Our Anti-slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Definitions

Modern Slavery

Modern slavery is an umbrella term covering slavery, servitude, forced or compulsory labour and human trafficking. It includes situations in which people cannot freely refuse or leave work because of coercion, threats, deception or abuse of vulnerability. Linear will comply with applicable legislation, including the Modern Slavery Act 2015 and the Human Trafficking and Exploitation (Scotland) Act 2015.

Human Trafficking

Human trafficking involves recruiting, transporting, transferring, harbouring or receiving a person for exploitation, including through force, threats, coercion, fraud, deception or abuse of vulnerability. It can occur within one country or across borders. Apparent agreement to travel or work does not rule out trafficking, and exploitation need not occur immediately after travel.

Safeguarding

Safeguarding means protecting people's right to live in safety, free from abuse, neglect and exploitation. It involves organisations working together to prevent harm, respond to concerns and support affected people, taking account of their needs and wishes.

Forced Labour

All work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

Harmful Child Labour

Consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

Whistle Blowing

Whistleblowing occurs when an individual raises concerns, usually to their employer or a regulator, about a workplace danger or illegality that affects others. The Public Interest Disclosure Act 1998 is the key piece of UK legislation protecting individuals who 'blow the whistle' in the public interest.

Supply Chain

The supply chain includes all organisations and individuals involved in supplying goods, materials, works, services or labour to Linear, directly or indirectly. This includes suppliers, subcontractors, recruitment and labour agencies, labour intermediaries and self-employed operatives.

The company shall respect freedom of association and the effective right to collective bargaining: the company is committed to creating an environment that respects the rights of all employees. In line with applicable legislation, every employee has the right to join, or refrain from joining, any trade union. We will not discriminate against any individual on the basis of union membership or involvement in union activities. Where unions are present, the company will engage with recognised representatives in good faith to support positive employee relations.

Purpose and Scope

Linear UK Group aims to prevent modern slavery and human trafficking throughout its operations and supply chains. This policy applies to the group companies identified below, their directors, employees and others working on their behalf, and sets expectations for suppliers, subcontractors and labour providers.

The objectives of this Policy are:

1. To complete legally required right-to-work checks for all direct employees before employment begins, and follow-up checks where required. Agencies and subcontractors must fulfil their own legal responsibilities, with proportionate assurance from Linear. Right-to-work checks alone do not establish that a worker is free from exploitation.
2. To raise awareness across the workforce and supply chain, provide induction awareness to all employees and deliver role-specific training to those responsible for recruitment, procurement, site management and responding to concerns.
3. To assess and monitor modern slavery risks in operations and supply chains, including agencies, subcontractors and self-employed arrangements, and to act promptly on concerns through safe reporting, worker-centred remediation and documented corrective action.

Responsibilities

The Board oversees this policy and provides appropriate resources. The HR Director is the policy owner and acts as the Anti-Slavery and Human Trafficking Officer, coordinating training, concerns, referrals and monitoring. Procurement staff must assess suppliers and follow up corrective actions; site and contract managers must communicate reporting routes, monitor labour arrangements and escalate concerns promptly. Everyone working for or on behalf of Linear must remain alert and report suspected exploitation.

Requirements for Suppliers

- Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty.
- Will ensure that the overall terms of employment are voluntary.
- Will comply with the minimum age requirements prescribed by applicable laws.
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements.
- Will abide by applicable law concerning the maximum hours of daily labour.
- Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK.
- Must not retain passports or identity documents, restrict workers' movement or use threats, deposits or debt bondage to prevent workers leaving employment on lawful terms. Temporary access to original documents for lawful checks must not prevent workers retaining control of them.
- Must ensure workers do not bear recruitment fees or related recruitment costs, receive understandable written terms, retain control of their wages and can raise concerns without retaliation. Suppliers must investigate any prohibited fees and arrange appropriate reimbursement.
- Must cooperate with proportionate due diligence and confidential worker engagement, maintain relevant employment and payment records, report suspected exploitation to Linear promptly and implement agreed corrective actions. These expectations must be communicated through their own supply chains.
- Will ensure that any sub-contractors or suppliers from whom they source goods and/or services for incorporation in those supplied to Linear, also adhere to these requirements.

What We Do

Linear will conduct risk-based checks across its sites, offices and supply chains, including random private worker interviews coordinated by the HR Director. Interviews support identification of concerns; they do not certify the absence of exploitation or replace pre-employment checks. Participation must be safe and voluntary, without managers or labour providers influencing answers, and independent interpreting support will be arranged where needed.

- Interviews are carried out in a private room
- Interview process is explained to the interviewee
- The same question set will be followed at all interviews
- Appropriate right-to-work assurance records are reviewed; interviews do not replace the employer's statutory checks.
- Confirmation that minimum wage or above is being paid
- Conversation around living situation
- Conversation around treatment on site

Risk Assessment and Supplier Due Diligence

Before appointment, procurement staff will assess suppliers and labour providers proportionately, considering sector and location, recruitment practices, subcontracting tiers, labour arrangements and available evidence of employment safeguards. Higher-risk suppliers require enhanced checks, which may include worker interviews, employment and wage records, recruitment-fee checks and site visits. Contract terms must reflect this policy and appropriate audit and corrective-action rights. Risk assessments will be reviewed at least annually and following significant changes or concerns; higher-risk suppliers will be monitored more frequently. Findings, responsible owners, deadlines and closure evidence must be recorded and escalated to the HR Director where unresolved.

Reporting Concerns

Employees, agency workers, subcontractors and suppliers may raise concerns verbally or in writing with their line manager, Site Manager or HR Director, including through Linear's whistleblowing procedure. Managers must escalate concerns promptly to the HR Director. If that person is implicated, unavailable or an inappropriate contact, reports may be made directly to the CEO or another uninvolved Director. Proof is not required to raise a genuine concern. Reports may be anonymous, although this can limit follow-up. Information will be restricted to those who need it for a lawful response; absolute confidentiality cannot be guaranteed. Linear prohibits retaliation against anyone raising a genuine concern or assisting an investigation, even if the concern is not substantiated.

Immediate Safety and Support

Call 999 where anyone is in immediate danger. Concerns may also be reported directly to the police or the Modern Slavery & Exploitation Helpline on 08000 121 700; internal reporting is not a prerequisite. Do not confront suspected perpetrators or take action that could endanger workers. The HR Director, or an uninvolved director where necessary, will coordinate a prompt safety assessment, preserve relevant records securely and seek specialist advice. Responses must prioritise affected workers' safety, needs and wishes, use independent language support where needed and involve appropriate safeguarding services or a designated first responder for support and any National Referral Mechanism referral. Consent and information sharing must be handled in accordance with applicable law and safeguarding requirements.

Training, Records and Review

All employees will receive modern slavery awareness at induction. Recruitment, procurement, site-management and HR staff will receive role-specific training on indicators, supplier checks, reporting and safe responses, with annual refreshers and updates following significant changes. HR department will maintain training records and a secure record of concerns and actions, with access and retention managed under applicable data protection requirements. At least annually, the Board will review risk assessments, training completion, supplier checks, worker engagement and corrective-action completion, considering lessons from concerns rather than treating low reporting as proof of success. This policy will be reviewed annually and sooner following significant legal or operational changes or incidents.

Consequences

The Linear UK Group takes any breach of this Policy extremely seriously.

Suspected breaches will be assessed promptly and fairly, with immediate protective measures where necessary. Supplier responses may include enhanced monitoring, a time-bound corrective-action plan, suspension of affected activities or termination where justified, subject to contractual rights and applicable law. Refusal to cooperate with reasonable checks will be escalated to the HR Director and relevant Director. Disengagement must be assessed carefully to avoid increasing risks to affected workers.

The HR Director, acting as Anti-Slavery and Human Trafficking Officer, will coordinate worker-centred remediation with appropriate specialists and authorities. This may include securing access to support, addressing unpaid wages or prohibited recruitment fees through appropriate channels, and requiring changes to recruitment and employment practices. Actions must have named owners, deadlines and follow-up checks. Suspected criminal conduct will be referred to the appropriate authorities where required or appropriate, with due regard to safety, consent and legal duties. Employee breaches may result in disciplinary action under the applicable procedure.

If a Supply Chain Member to Linear is found in violation of this policy, Linear will take prompt action which may include terminating any supply agreement, arrangement or other contract with that Supply Chain Member (as above). It shall also take such other (remedial) steps as the Anti- Slavery and Human Trafficking Officer shall determine to be necessary to address the violation and seek to prevent its reoccurrence.

Signed:  ***Date:*** *09 November 2026*

STEPHEN HOLMES, CEO

Note: The scope of this policy includes Linear UK Group Ltd, Linear Projects Limited, Linear Design and Construct Limited and Linear Building Compliance Limited.