

## FORCED LABOUR POLICY

We abide by the four core labour standards as enshrined within the International Labour Organisations (ILO) Conventions:

- Freedom from forced labour  
(enshrined in Convention 29 on Forced Labour (1930) and Convention 105 on the Abolition of Forced Labour (1957)).
- Freedom from child labour  
(enshrined in Convention 138 on Minimum Age for Entry into Employment (1973) and Convention 182 on the Worst Forms of Child Labour (1999)).

The Company will ensure that all relevant legislation and restrictions are adhered to in regard to the use of young workers. We will ensure that the necessary checks are carried out to verify an individual's age and right to work, and that relevant Health and Safety codes are adhered to.

Where required, the Company will ensure that the relevant employment permit is received from the education department of the local council.

We will also carry out spot checks when required and will retain copies of age records within the place of work.

- Freedom from discrimination at work  
(enshrined in Convention 100 on Equal Remuneration (1951) and Convention 111 on Discrimination in Employment and Occupation (1958)). We are committed to promoting equality in line with the Equality Act 2010, ensuring fair treatment regardless of age, gender, race, religion, disability, or any other protected characteristic.
- Freedom to form and join a union, and to bargain collectively  
(enshrined in Convention 87 on Freedom of Association and Protection of the Right to Organise (1948) and Convention 98 on the Right to Organise and Collective Bargaining (1949)).

We prohibit the use of forced labour, bonded labour, prison labour and child labour within our company or those that supply to or sub-contract for us. This includes slavery and abduction, misuse of public and prison works, forced recruitment, debt bondage and domestic workers under forced labour situations, child labour and internal or international trafficking.

We ensure that all of our employees work voluntarily for us and are not intimidated or threatened to enforce employment. Also that they retain their rights and privileges.

We do not employ any person under the age of 17 and where there is a benefit to the company and to the young worker to do so, we ensure that we uphold relevant statutory requirements, that they continue to have access to further education (apprenticeships) to improve their qualification and skills and that they will not work in any hazardous environment, above the legally acceptable weekly hours and not at weekends or at night.

Concise records are held for employees and an appraisal system ensures that the employee is fairly treated and has 'a voice' to represent themselves and to notify of any contravention with the directives of this policy. Receipt and review of two forms of official documented evidence of date of birth (i.e. Passport, Birth Certificate, National Identity Card or Driving Licence) is a prerequisite for young workers..

Managers who are responsible for employee recruitment and monitoring procedures associated with forced labour, bonded labour, prison labour and child labour or supplier chain implementation and evaluation are

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given training, guidance and instruction to ensure that they understand the law, the processes and can effectively administer its directives.

We have procedures in place to ensure that we maintain this policy and ensure that our suppliers and partners do likewise. Quarterly meetings are held by the Director and the Office Manager who is the designated responsible person, to ensure that we are monitoring this policy and associated procedures and to discuss any issues or complaints relevant to them.

We conduct proportionate risk assessments of our suppliers based on geography, sector, and employment practices. Where risks are identified, we may request further information or conduct audits as part of our due diligence

## Reporting concerns

We encourage employees, suppliers, and third parties to raise any concerns in confidence through our Whistleblowing Policy or by contacting the Managing Director.

Where it is determined, following employment, that a Young Labourer or young worker is actually child labour, we will endeavour to resolve the issue amicably with the parent / guardian's involvement which may include agreed financial assistance and subject to vacancy, will always include re-employment at the minimum working age should the child want it.

There is a supplier declaration which all suppliers must sign and return. Suppliers who do not uphold the code are removed from our approved suppliers list as part of our internal compliance standards.

Signed:



Jason Spencer, Managing Director

Date: 16/08/2025

Next Review: 15/08/2026

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