



MODERN SLAVERY POLICY

Maestroclear Limited T/A CT Construction

Version 3

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Approved by Mark Thomson – Managing Director

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Signed

A handwritten signature in dark ink, appearing to read 'Mark Thomson'.

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INTRODUCTION

Maestroclear Limited T/A CT Construction firmly believe that modern slavery in all its forms (human trafficking, slave and child labour, indentured, forced, and debt bonded), have no place in our world and are unacceptable at any level. We are fully committed to preventing these practices occurring in our operations and supply chain.

OUR SUPPLY CHAIN

Maestroclear Limited T/A CT Construction are committed to ensuring that modern slavery and human trafficking plays no part in our supply chain or any part of our business. We act ethically and with integrity in all our business relationships. We have implemented and enforce effective systems and control to, so far as is reasonably practicable, ensure slavery and human trafficking are not taking place anywhere in our company or our supply chain. We do not utilise agency companies for staff recruitment.

We utilise suppliers throughout Scotland to source materials, manufactured products, and plant to carry out our works and services. As a business our use of subcontractors is minimal, however when the services of a subcontractor are employed, they must complete a subcontractor approval forms before works can commence, to ensure that their values align with ours.

As part of our initiative to identify and diminish risk we:

- Require supplier and subcontractor to complete HSEQ approval forms to ensure that they hold the same values as us regarding the eradication of modern slavery.
- Build long-standing interactions with our suppliers and subcontractors and make clear our outlooks of business behaviour.
- Have in place systems to encourage the reporting of concerns and the safeguarding of whistleblowers as covered in [CT011 – Whistleblowing Policy 2025](#).

As a business we expect all those in our supply chain and subcontractors used to comply with our values, and to take the same zero tolerance approach to modern slavery and human trafficking.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking, we provide training to relevant members of staff. [Appendix A](#) covers the potential signs of modern slavery and [Appendix B](#) covers how to report if you have concerns of modern slavery.

This policy is communicated to all staff regardless of their position within the company to ensure that they are aware of our commitment to eradicating modern slavery.

KEY PERFORMANCE INDICATORS (KPIS)

To assess the effectiveness of our modern slavery measures we will be reviewing the following KPIs:

- For new suppliers/subcontractors, we provide a Supplier Assessment Form to be completed and supporting evidence to be returned
- For existing suppliers/subcontractors, we renew the Supplier Assessment Form on a 2-yearly basis to ensure compliance has continued
- Our policies are available for review
- Staff training
- Our policy undergoes annual review and further review in the event of changes to legislation or best practice

APPENDIX A – SPOTTING THE SIGNS OF MODERN SLAVERY

Signs of a potential victim of modern slavery may include:

- They seem malnourished and tired
- If from overseas, they don't speak much English
- They wear unsuitable clothes for work, or for the weather
- They appear to be under the control of someone else and reluctant to interact with others
- They are reluctant to make eye contact or talk to people
- They work excessively long hours and seldom, if ever, have days off
- They appear fearful, uneasy, or anxious and distrustful of authorities
- They have untreated injuries
- They allow others to answer questions put to them
- They are confined to their workplace and there may be signs that they also sleep there

Signs someone you know or speak to frequently may be a victim of modern slavery may include:

- They always appear scruffy and unwashed
- They lack personal possessions
- They are frequently dropped off or picked up at unsociable hours
- They don't know their home or work address
- They have limited social contact or contact with their family
- They never seem to have any or much money, despite working long hours
- They don't have possession of their passport, driving license or other identification documents
- You perceive that they are in debt to their boss or someone else
- If female, she has an unwanted or underage pregnancy
- They offer incoherent or changing accounts of events
- They repeat a story that you have heard elsewhere—as if they and others have been instructed to learn it

Signs that a house, flat or other dwelling could be a base for modern slavery

- The property seems too small for the number of people that live there
- People appear to be bundled in and out of the property by others, often during darkness
- There are bars on the windows and/or the curtains are permanently drawn or boarded up

- Large numbers of young women have suddenly been moved into the property, which then receives lots of visitors' day and night
- The letterbox has been sealed over
- There is CCTV at the entrance to the property
- There is a pungent smell coming from the property
- Electricity is being re-routed from neighboring properties or directly from power lines

None of these indicators in isolation or combination can give you complete certainty, sometimes it will be a case of acting on your instinct that something is not right.

You do not need to be certain to report your concerns.

APPENDIX B – REPORTING YOUR CONCERNS

What to do if you spot the signs

If you suspect that someone is a victim of slavery, **DO NOT** try to talk to them about it, cause a scene, or confront the suspected perpetrators as this will likely lead to increased harm for the victim and may also put you at risk.

If it's safe to do so, gather as much detail as you can, e.g., descriptions of people involved, car registrations, why you have concerns, etc., but do not put yourself at risk in doing so.

If you have concerns that a stranger or someone you know is being or has been exploited, or even if you are unsure if someone needs help, **REPORT IT**. You have several options:

- Contact the Police - **For life-threatening emergencies, call 999, or for non-emergencies, call 101**
- Contact the [Modern Slavery Helpline](#) on **0800 121 700** or fill out an online form
- Call [the Salvation Army](#)'s 24/7 confidential referral helpline on 0800 808 3733
- Contact Crimestoppers anonymously on **0800 555 111** or via an [online form](#)
- Contact the Gangmasters and Labour Abuse Authority to report concerns about the mistreatment of workers on **0800 432 0804**, or by email intelligence@gla.gov.uk

Seeking advice about your concerns

You should report any concerns and trust your instinct, but if you're unsure or want further advice, you can use the following services:

- [Migrant Help](#) on 0808 8010 503
- [Victim Support](#) on 0808 16 89 111 or fill out an [online form](#)
- [Safe Car Wash app](#) helps gather information on the location of individual hand car washes and the working conditions on each to build a clear picture of the hand car wash sector. If there is a high likelihood that modern slavery is occurring in the hand car wash, you will be asked to report your concerns to the [Modern Slavery Helpline](#)

- [Anti-Slavery International](#) or other [specialist anti-slavery organisations](#)
- Report human trafficking via the **STOP APP** which can be downloaded [here](#). The STOP APP is a tool that enables anybody who knows, has seen or even heard a situation that they believe to be human trafficking, to talk about it in a safe and secure space (information is not shared with the police)