

DAWSON-WAM Ltd is a Civil Engineering Contractor carrying out contract works which include Marine & River engineering, piling operations, pipelines, building, road and rail work across the United Kingdom, Republic of Ireland and the Channel Islands.

Code of Ethics - DAWSON-WAM Ltd is committed to the highest level of ethical standards and improving our practices to ensure that the appropriate steps are in place to combat slavery, human trafficking and child labour as the Modern Slavery Act 2015. This culture is fundamental to our business and how we deliver our project works. supported by our membership of the Supply Chain Sustainability School.

Risk Assessment & Due Diligence – Working in the UK, the main risk of incidents within our business lies within our sub-contractors and supply of labour, with particular risk from overseas providers of materials. Our risk management process includes assessing the risk exposure to our company and the project works which we deliver. This rigorous process signals due diligence and human rights management through regular review of our onboarding process for new employees and continue to monitor and evaluate potential risk within our supply chain.

A Service Level Agreement (SLA) is in place with our suppliers, as part of our terms and conditions, which obliges them to comply with the Modern Slavery Act 2015 and other regulations, including Right to work provisions. (This forms part of our sub-contractor agreement).

We will only trade with those who fully comply and may terminate the contract at any stage, should it come to light any instances of slavery or human trafficking.

Recruitment & Right to Work - We will endeavour to ensure that slavery and human trafficking is not taking place within our workforce or our supply chain. Our employment procedures are transparent and reviewed regularly both internally and externally, compliant with the annual reporting requirements contained within Section 54 of the Act 2015. Procedures for the vetting of new employees include communicating directly with potential candidates, confirming their identities, and ensuring that they are paid directly into an appropriate, personal bank account.

Training & Awareness - We encourage openness across our business and recognise the important part that everyone must have to play in mitigating against the risk of exploitation and upholding the rights of all that work with us. All staff involved with procurement and the delivery of site works are trained on our policy and the potential risk relating to any new supply chain / subcontractor. Each aware of what red flags to look out for and what to do if any concerns. Empowering everyone through our Whistleblowing Policy to help drive forward industry efforts to eliminate modern slavery and trafficking within our business and supply chain.

Supplier Procurement - We will ensure that similar appropriate due diligence procedures are extended throughout our supplier chain, ensuring that the employment of non-UK Nationals undergo appropriate investigation to understand their recruitment methods and their management of permits and working visas.

We operate a preferred supplier list through our ISO Integrated Management System. whereby we ensure suppliers are aware of the issues surrounding modern slavery, how to eradicate it, and do not knowingly or unknowingly take part in the practice.

We operate a zero-tolerance policy to Slavery and Human Trafficking. All Directors and Managers responsible for procuring external goods and services are dedicated to ensuring that suppliers and providers always adhere to our ethos and support our compliance to the Modern Slavery Act 2015.

Ethical Sourcing - All new suppliers are provided with a copy of the policy & procedures within the company and are required to confirm their compliance with our ethos before commencing the supply of goods or services. Our project ISO procurement processes will focus on higher risk material suppliers and subcontractors including review and approval through our supply chain questionnaire (QP06.1).

Policies and Procedures

We operate many internal policies to ensure that our business is conducted in a transparent and ethical manner.

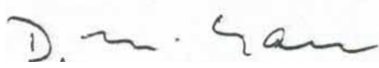
- Anti bribery policy
- Anti-slavery & Human trafficking policy
- Harassment policy
- Recruitment policy
- Whistleblowing policy
- Supply chain policy
- Business Ethics policy
- Right to work policy

Measuring Effectiveness

We have introduced the following KPIs' in response to the Modern Slavery Act 2015

- 100% of our suppliers to have agreed to our supplier terms and conditions.
- 100% of all existing and new staff complete our compulsory Modern Slavery training.
- 100% of all sub-contractors complete Toolbox talks on Modern Slavery.
- 100% of staff receive ongoing updates and refresher training every 18 months.

We fully support the government's objectives to eradicate modern slavery and human trafficking and encourage anyone (including employees, sub-contractors, suppliers and clients) to report in good faith any issues or concerns about potential ethics, human rights, legal or regulatory violations, including improper or unethical business practices such as fraud or bribery.



Signed:

Date: 5th January 2026

D.E. McGall
Managing Director

