

Our Business - DAWSON-WAM Ltd is a specialist civil engineering and piling contractor operating across the UK and Ireland since 1971. We deliver projects ranging from £100k to £20m for the public sector and private sector. Services include civil engineering, piling, and steelwork solutions, supported by our modern plant fleet and in-house design capabilities.

DAWSON-WAM combines technical expertise and sustainable practices to provide reliable, large-scale infrastructure and geotechnical solutions.

Organisational Structure - We are a private incorporated company operating throughout the UK & Ireland. We have approximately 110 employees; with offices in England and Northern Ireland.

Our business is overseen by our Board of Directors and Senior Leadership Team, with responsibility for ensuring that appropriate policies, procedures and controls are in place to identify and address the risks of modern slavery and human trafficking within our operations and supply chain. Supported by our employees, supply chain and business partners.

Policy - Modern slavery can happen in any industry, including construction. Affecting workers employed directly by our business or others working as contractors, subcontractors, labour agencies or suppliers to our business. DAWSON-WAM Ltd recognise the importance of being alert to the signs of modern slavery and taking action where concerns are identified.

We acknowledge our responsibilities in relation to tackling modern slavery and commit to complying with the provisions in the Modern Slavery Act 2015. We understand that this requires an ongoing review of both our internal practices in relation to its labour force and additionally our supply chain.

The Company does not enter into business with any other organisations, in the UK or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Company in the pursuance of the provision of our own services is obtained by means of slavery or human trafficking. We strictly adhere to the standards required in relation to our responsibilities under relevant employment legislation within the UK and Ireland.

We fully support the government's objectives to eradicate modern slavery and human trafficking and encourage anyone (including our 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.

Our Modern Slavery & Human Trafficking Policy Statement is made in pursuance of s.54(1) of the Modern Slavery Act 2015 and is reviewed for each financial year (currently ending 31st December 2025).

Code of Ethics – Under the Leadership of our Managing Director, 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. This commitment is 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. We operate a preferred supplier database and conduct due diligence on all suppliers before allowing them to become a preferred supplier, through regular review we continue to monitor and evaluate potential risk within our supply chain.

Our Supply Chain – Our supply chain includes companies who supply raw materials, specialist trade contractors who undertake supply and fix contracts, labour-only subcontractors, and specialist consultants.

We adopt a risk-based approach to identifying, assessing and managing modern slavery risks within this 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, along with successful completion of our Subcontractor Questionnaire QP06.1 to assess risk. Promoting responsible employment practices which require compliance with our relevant policies and contractual requirements, which is monitored by our ISO Integrated Management System internal and 3rd party audits, including BSI & Achilles Building Confidence / UVDB Verify.

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.

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

Recruitment & Right to Work - We 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 Modern Slavery 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.

Supplier Procurement - We 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 zero-tolerance policy to Modern Slavery and Human Trafficking. All Directors and Managers who are responsible for procuring external goods and services, ensure that all suppliers and providers always adhere to our ethos and support our compliance to the Modern Slavery Act 2015.

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.

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. Policies are displayed on our site notice boards.

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

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

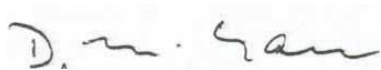
Measuring Effectiveness - We have introduced the following targets to monitor compliance under Modern Slavery Act 2015.

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

Key contacts - 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. Here are some contacts for reporting any concerns:

- **Modern Slavery & Exploitation Helpline UK** – 08000 121 700 / Report concerns online <https://www.modernslaveryhelpline.org/>
- **Government Fair Work Agency (FWA)** - Modern slavery and labour exploitation referral phone line (0800 432 0804). Calls are free and will be answered between 9am and 5pm, Monday to Friday. You can still call outside of these hours and leave a voice message. Other ways to contact: contact@fairworkagency.gov.uk

None of the above are an emergency service number. If anyone is in immediate danger, call 999 and ask for the police.



Signed:

Date: 11th August 2026

D.E.McGall
Managing Director

