



## Modern Slavery Policy


This document forms part of the Company's Integrated Management System (IMS).

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This document operates alongside the Quality Management System. Documentation supporting accredited inspection and laboratory activities remains controlled under the Quality System Document Control Procedure (Sys01).

The arrangements defined within this document support the Company's compliance with ISO/IEC 17020, ISO/IEC 17025, ISO 14001, ISO 45001 and the Legionella Control Association (LCA) Scheme requirements where applicable.

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<b>Document Name:</b>	IMS-POL-10	<b>Revision:</b>	Rev01

<b>Franks Portlock Consulting Ltd</b>		<b>Integrated Management System</b>
Document: <b>IMS-POL-10</b>	Title:	Document Classification:
Revision Number: <b>Rev01</b>	<b>Modern Slavery Policy</b>	<b>Controlled Document</b>
Issue Date: <b>16/04/2026</b>		Review Date: <b>16/04/2027</b>

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**1.0 Introduction**

Franks Portlock Consulting Ltd (hereinafter referred to as “the Company”) operates across asbestos surveying, air monitoring, laboratory analytical services, Legionella risk assessment, water hygiene operations and associated consultancy services within regulated environments where ethical conduct, transparency and respect for human rights are fundamental to service delivery.

The Company recognises that modern slavery, human trafficking, forced labour and exploitation present significant legal, ethical and reputational risks and may arise within business operations and supply chains if not effectively identified, assessed and controlled.

Failure to manage such risks may result in legal non-compliance, reputational damage, harm to individuals and compromise the integrity of operational and technical outputs, including those delivered under accredited activities.

The Company operates a zero-tolerance approach to modern slavery and human trafficking and is committed to acting with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere within its operations or supply chains.

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Document: <b>IMS-POL-10</b>	Title:	Document Classification:
Revision Number: <b>Rev01</b>	<b>Modern Slavery Policy</b>	<b>Controlled Document</b>
Issue Date: <b>16/04/2026</b>		Review Date: <b>16/04/2027</b>

This Policy establishes the framework for identifying, preventing and addressing the risks of modern slavery and human trafficking and supports a culture of ethical accountability, transparency and responsible business conduct.

Where applicable, the Company will produce and publish an annual Modern Slavery and Human Trafficking Statement in accordance with the Modern Slavery Act 2015.

This Policy is supported by the Employee Handbook, which provides additional guidance on expected standards of behaviour and workplace conduct. In the event of any conflict, this Policy shall take precedence.

## 2.0 Purpose

The purpose of this Policy is to establish a structured governance framework for the prevention, identification and management of risks relating to modern slavery, human trafficking, forced labour and exploitation.

This Policy defines the standards, responsibilities and control measures required to ensure that all business activities are conducted in a lawful, ethical and responsible manner, and that proportionate and risk-based measures are implemented to identify, assess and mitigate risks within the Company's operations, procurement activities and wider supply chain.

This Policy also supports compliance with applicable UK legislation and reinforces the Company's commitment to ethical sourcing, responsible procurement and the protection of human rights.

## 3.0 Scope

This Policy applies to all personnel engaged in activities on behalf of the Company, including employees, temporary personnel, contractors, consultants and any authorised third parties acting for, or representing, the Company.

The requirements defined within this Policy apply to all business activities, including operational, inspection, laboratory, administrative and managerial functions, and extend to procurement activities, supplier onboarding, subcontractor engagement and ongoing supplier management.

The Policy applies across all locations where Company business is conducted and reflects the expectation that consistent standards are maintained regardless of role, seniority or operational environment.

The requirements of this Policy extend to the Company's supply chain, including suppliers, subcontractors and business partners, who are expected to operate in accordance with applicable legislation and ethical standards.

Where relevant, additional guidance relating to conduct and reporting expectations is provided within the Employee Handbook.

## 4.0 Legal and Management Framework

This Policy is developed in accordance with applicable UK legislation and regulatory requirements, including but not limited to:

- Modern Slavery Act 2015
- Immigration and Asylum Act 1999
- Employment Rights Act 1996
- Equality Act 2010

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The implementation of this Policy supports the Company's broader governance framework, including ISO/IEC 17020 and ISO/IEC 17025, where integrity, impartiality and ethical conduct are essential to maintaining the validity of inspection and laboratory activities.

This Policy operates in conjunction with the Company's Integrated Management System, including arrangements for procurement, supplier management, incident reporting, audit and management review.

This Policy also aligns with Section 54 reporting requirements of the Modern Slavery Act 2015 where applicable and supports the Company's broader governance arrangements for ethical compliance, risk management and responsible procurement.

## 5.0 Roles and Responsibilities

### Senior Management

Ensure that appropriate resources, governance arrangements and controls are in place to support the effective implementation of this Policy. Maintain oversight of modern slavery risk management through Management Review, including the review of supply chain risks, incidents and assurance activities.

### Compliance Manager

Maintain this Policy within the Integrated Management System and monitor compliance with legal and regulatory requirements. Coordinate risk assessment activities, support investigations and ensure that corrective actions are implemented where required.

### Quality Manager

Ensure that risks associated with modern slavery do not compromise the integrity, impartiality or validity of accredited activities. Support assurance processes relating to supplier controls and operational compliance.

### Line Managers

Implement this Policy within their area of responsibility. Ensure that personnel understand their obligations and that any concerns relating to modern slavery or unethical practices are identified and escalated appropriately.

### Employees

Comply with the requirements of this Policy and report any concerns relating to modern slavery, human trafficking or unethical practices in accordance with Company procedures.

### All Personnel

Maintain appropriate standards of professional conduct and ensure that actions and decisions do not contribute to or enable exploitation within operations or supply chains.

Responsibilities defined within this Policy apply unless superseded by site-specific arrangements, contractual obligations or permit-controlled activities.

## 6.0 Risk Assessment and Due Diligence

The Company recognises that modern slavery risks may arise within supply chains and certain operational environments.

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To manage these risks, the Company will:

- Conduct proportionate risk assessments of suppliers and business partners
- Undertake due diligence during procurement and onboarding processes
- Require suppliers to demonstrate compliance with applicable legislation and ethical standards
- Include contractual provisions requiring adherence to anti-slavery requirements
- Monitor supplier performance and take action where risks are identified

Where higher risk activities or regions are identified, enhanced due diligence and monitoring measures will be applied.

Where significant risks or breaches are identified, the Company reserves the right to suspend or terminate supplier relationships in line with contractual and legal obligations.

## 7.0 Training and Awareness

The Company will ensure that personnel are appropriately informed of modern slavery risks and their responsibilities in identifying and reporting concerns.

This includes providing relevant training, promoting awareness of reporting mechanisms and reinforcing the importance of ethical conduct across operations and supply chains.

## 8.0 Reporting and Escalation

Any concerns relating to modern slavery, human trafficking or unethical practices must be reported through appropriate Company channels.

Reports may be made to Line Managers, Senior Management or the Compliance Manager, and may also be raised in accordance with the Company's Whistleblowing Policy.

All concerns will be treated seriously and managed in a timely and proportionate manner. Concerns raised in good faith will be supported and handled without detriment to the individual.

## 9.0 Monitoring, Review and Continuous Improvement

The effectiveness of this Policy will be monitored through internal audits, supplier reviews, incident reporting and management review processes.

Findings will be used to identify areas for improvement and to ensure that controls remain effective.

This Policy will be formally reviewed at least annually, or sooner where required due to changes in legislation, regulatory requirements or organisational structure.

## 10.0 Revision History

Revision	Date	Description of Change	Approved by
Rev01	16/04/2026	Initial issue of IMS-POL-10 Modern Slavery Policy	Technical Director