# Modern Slavery and Human Trafficking Statement

## Weinsulate.co.uk Limited

**Company Number: 12747624**

**Financial Year: 2025-26**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps that Weinsulate.co.uk Limited has taken, and continues to take, to ensure that slavery and human trafficking are not taking place in any part of our own business or in any of our supply chains. We are committed to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls to safeguard against any form of modern slavery taking place within the business or our supply chains.

## 1. Organisational Structure, Business and Supply Chains

### Our organisation

Weinsulate.co.uk Limited is a UK-registered company (Company Number 12747624) based in Weybridge, Surrey. We operate as a domestic and commercial energy efficiency and retrofit installer, providing services including external wall insulation (EWI), solar photovoltaic (PV) installation, battery storage, cavity wall and loft insulation, and related home retrofit measures delivered under government and grant-funded schemes such as the GLA Warm Homes Local Grant - SHDF and retrofit programmes.

We hold a range of accreditations relevant to our installation activities, including TrustMark, NICEIC, MCS (Microgeneration Certification Scheme) and Gas Safe Register, NICEIC and we operate in compliance with relevant technical standards including PAS 2030/2035, MCS 012 and BS 7671.

### Our supply chains

Our supply chains include manufacturers and distributors of insulation materials, solar PV panels and inverters, battery storage systems, scaffolding and access equipment, and general construction materials. We also engage subcontracted labour and specialist trades to deliver installation works, and we work with third-party suppliers for IT, professional services and other business support functions.

## 2. Our Policies in Relation to Slavery and Human Trafficking

We are committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our approach to tackling modern slavery is reflected in the following internal policies, which are reviewed periodically and made available to relevant staff:

- Anti-Slavery and Human Trafficking Policy – setting out our zero-tolerance approach and the expectations placed on staff and suppliers.
- Recruitment and Right to Work Policy – ensuring all workers, whether directly employed or supplied via agencies and subcontractors, have the right to work in the UK and are engaged on fair, transparent and legally compliant terms.
- Whistleblowing Policy – enabling staff to raise concerns, including suspicions of modern slavery, in confidence and without fear of reprisal.
- Code of Conduct – setting out the standards of ethical behaviour expected of employees, contractors and suppliers.
- Procurement and Supplier Policy – incorporating anti-slavery expectations into supplier selection and contract terms.

## 3. Due Diligence Processes

We undertake due diligence on our business and supply chains to identify, assess and mitigate the risk of modern slavery. Our due diligence processes include:

- Verifying the right to work in the UK for all directly employed staff prior to engagement.
- Requiring labour-supply subcontractors and agencies to confirm compliance with relevant employment legislation, including the Modern Slavery Act 2015, the National Minimum Wage Act and the Gangmasters and Labour Abuse Authority (GLAA) licensing requirements where applicable.
- Reviewing key suppliers and subcontractors prior to onboarding, including checks on company registration, trading history and, where relevant, accreditation status.
- Including anti-slavery and human trafficking clauses in supplier and subcontractor terms and conditions, with the right to terminate arrangements in the event of non-compliance.
- Maintaining clear escalation routes for staff and site supervisors to report concerns about labour conditions, including signs of forced labour, withheld identity documents, excessive working hours or unsafe accommodation.
- Periodic review of due diligence processes as part of our wider compliance and tender documentation requirements.

## 4. Risk Assessment and Risk Areas

We recognise that certain parts of our business and supply chains carry a higher inherent risk of modern slavery, in line with sector-wide risks recognised in the UK construction and retrofit industry. These include:

- Subcontracted and labour used for installation works, where there is a risk of labour exploitation, false self-employment or non-compliant recruitment practices.
- Lower-tier suppliers of raw materials and manufactured products (such as insulation materials and PV components), where supply chains may extend overseas to jurisdictions with weaker labour protections.
- Use of subcontracted scaffolding, transport and logistics providers.

To manage these risks, we take the following steps:

- Prioritising the use of established, accredited suppliers and subcontractors with a known compliance history.
- Carrying out site-level checks on subcontracted labour, including verification of identity and right-to-work documentation.
- Including modern slavery compliance requirements within our PQQ and tender submissions, and requiring equivalent assurances from our own subcontractors and suppliers.
- Raising awareness among site supervisors and managers of the indicators of modern slavery and labour exploitation.

## 5. Effectiveness – Key Performance Indicators

We assess the effectiveness of the steps we are taking to ensure modern slavery is not taking place in our business or supply chains using the following indicators:

- Number of suppliers and subcontractors who have signed up to our anti-slavery and human trafficking terms.
- Completion rate of right-to-work checks for all new starters and subcontracted labour.
- Number of modern slavery or labour exploitation concerns raised through our whistleblowing or reporting channels, and the outcome of any investigations.
- Feedback from internal audits, accreditation assessments (e.g. TrustMark, MCS) and tender/procurement due diligence reviews.
- Staff completion rates for modern slavery awareness training.

We will continue to monitor and develop these indicators as our due diligence processes mature.

## 6. Training and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and supply chains, we provide training and guidance to relevant staff, including:

- Induction training for new employees and site supervisors covering our anti-slavery policy and the indicators of modern slavery and labour exploitation.
- Guidance for staff involved in procurement, recruitment and subcontractor management on conducting appropriate due diligence.
- Periodic toolbox talks and briefings for site-based teams on identifying and reporting concerns relating to worker welfare.
- Clear internal guidance on how to report suspected instances of modern slavery, including via our whistleblowing procedure.

## 7. Approval

**Policy Statement**

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

weinsulate.co.uk Limited Prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

**Commitments**

Modern Slavery and Human Trafficking - Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.
We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

We take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

Consistent with our risk based approach we may require:

- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct.
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code

As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might

represent the best outcome for those individuals impacted by the breach to terminating such relationships.

This statement was approved by the Board of Directors of Weinsulate.co.uk Limited and will be reviewed and updated annually.

**Signed:** *E.Smith-Hutchon*

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*ERIC SMITH-HUTCHON*
*Director, Weinsulate.co.uk Limited*
*Date:30/06/2026*