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	Issue Date: 23 January 2026	Issue Number: SG005 version 2

Modern Slavery Statement

Introduction

Safeguard Europe Ltd is committed to acting ethically and with integrity in everything we do. We recognise that modern slavery and human trafficking are serious global issues and violations of basic human rights. We take a zero-tolerance approach to these practices within our own operations and across our supply chain. This statement explains the steps we take to prevent modern slavery and ensure our business does not support or enable exploitation.

Organisation and Supply Chain Structure

Our Business: Safeguard Europe Ltd is a market-leading manufacturer and supplier of specialist building protection products. Established in 1983 and headquartered in Horsham, West Sussex, we are a family-owned business employing over 75 staff in the UK. We specialise in damp-proofing, waterproofing, and masonry repair systems for the construction and refurbishment sectors. Our structure includes:

- **Safeguard Europe Ltd:** Our primary manufacturing and distribution hub in the UK.
- **Safeguard Europe GmbH:** A German entity facilitating direct sales to trade customers in Germany.
- **Fulfilment Partners:** We work with third-party fulfilment centres in Europe to manage distribution to our international domestic and trade customer base.

Our Supply Chain: Our products are primarily manufactured in the UK using globally sourced materials. We work closely with our direct suppliers and acknowledge that mapping the wider supply chain is an ongoing process. We aim to further develop our understanding of these extended networks as our processes evolve.

Governance: The Managing Director has ultimate responsibility for the approval and annual review of this statement.

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Organisational Policies

Safeguard Europe is committed to maintaining the highest standards of ethical conduct and integrity in all business dealings. Our internal policies are designed to create a transparent work environment and ensure that no form of modern slavery or human trafficking exists within our operations or supply chains.

The following policies form the backbone of our commitment to identifying and preventing modern slavery:

- **Anti Slavery Policy:** We operate a zero-tolerance approach. We voluntarily produce a Modern Slavery statement to explain the steps we take to ensure these practices do not occur in any part of our business or supply chains.
- **Whistleblowing Policy:** We encourage employees to use our whistleblowing procedure to raise any concerns regarding slavery or human trafficking. Under this policy, employees are protected from detriment or termination when making "qualifying disclosures" that show the company has committed a criminal offence or failed to comply with legal obligations.
- **Recruitment and Right to Work:** All employees are legally required to provide evidence of their right to work in the UK before employment begins.

Policy Distribution and Monitoring

To ensure our standards are effectively communicated and enforced, we utilise a dedicated HR system (BrightHR) to cascade new and updated policies to all staff. This system allows us to:

- **Induct New Staff:** All new employees must complete an induction programme where all company policies and procedures are explained.
- **Track Engagement:** We actively monitor when employees have read and acknowledged policies via the digital platform to ensure full organisational awareness.
- **Maintain Accessibility:** All employees have continuous access to the most recent version of the Employee Handbook and related policies.

Policies are reviewed annually to demonstrate continuous improvement and practical progress in our anti-slavery efforts.

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Assessing and Managing Risk

Safeguard Europe understands that identifying risk is a continuous process. We evaluate our risk exposure by analysing both our direct operations and our extended supply chains to ensure our efforts are targeted where they can have the most impact.

To manage international risks, we use Sedex (the Supplier Ethical Data Exchange). We utilise the platform's risk assessment tools to score our suppliers based on their industry and geographic location. This data-driven approach allows us to identify potential high-priority areas for further monitoring and ensures our sourcing remains transparent.

Internal Monitoring

We maintain close oversight of our workforce through direct management and clear processes. We use BrightHR to share and track acknowledgement of our anti-slavery and ethical policies. All employees undergo right to work checks in line with government requirements, and we regularly verify that everyone is paid at least the National Minimum Wage

Management and Oversight

The responsibility for identifying and mitigating risk is shared across our leadership team to ensure a comprehensive approach:

- **Senior Operations Manager:** Responsible for supplier oversight and monitoring ethical standards.
- **Compliance & Continuous Improvement Manager:** Supports supplier monitoring and risk assessment updates.
- **Office Manager:** Leads overall compliance with the Modern Slavery Act, including annual policy reviews and coordinating awareness training for the workforce.

Any identified high-risk areas or concerns are reported directly to the Managing Director for immediate review and action.

Due Diligence in Relation to Modern Slavery

Our due diligence is designed to be proportionate to the identified risk, focusing on transparency and clear communication.

- **Reporting Concerns:** We encourage employees to raise any concerns about modern slavery or unethical behaviour, confident

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that all reports will be handled confidentially and without fear of negative consequences, in line with our Whistleblowing Policy.

- **Contractual Standards:** We clearly communicate our zero-tolerance approach to modern slavery to key suppliers and business partners. We expect them to act ethically and comply with the Modern Slavery Act 2015.
- **Vetting:** Before entering into new, long-term, or high-value relationships, we carry out basic checks to ensure our partners are legitimate and committed to ethical business practices.

Training

Safeguard Europe ensures all employees understand the risks of modern slavery and human trafficking and can identify potential signs of exploitation.

We provide all staff with a Modern Slavery awareness course. To ensure high standards and accuracy, this training is professionally accredited by: IOSH, CPD, IIRSM.

Monitoring and Evaluation

Safeguard Europe is committed to continuously improving how we prevent modern slavery and ensure our actions are effective. We track employee training with the aim of achieving 100% completion of our accredited Modern Slavery course. We use the Sedex platform to monitor and assess our suppliers, along with completion of our supplier questionnaire to confirm compliance with the Modern Slavery Act 2015. Where risks are identified, we take further steps such as additional checks, and we continue to improve how supplier data is reviewed and used to inform our business decisions.

This statement will be reviewed annually



Hudson Lambert

Managing Director