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Pipework Fabrication and Erection for the Gas, Petro-Chemical, Water Board and Power Generating Industries
General Fabrications and Machining
Site Welding
Civil Engineering
Plant Removal and Installation

Anti-Slavery and Human Trafficking Policy

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Prepared by	Karen Baczkowski				

Authorising Manager		
Mark Robinson		08/04/2026
(Name)	**(Signature)**	**(Date)**

Revision Register

Issue	Clause	Revision description	Date	Approved by
1	All	Initial issue	15/12/2016	M. Robinson
2	All	Annual review	15/11/2017	S. Baldwin
3	All	Annual review	15/11/2018	G. Sudron
4	All	Annual review	19/02/2020	A. Webster
5	All	Inclusion of child labour	30/09/2020	A. Webster
6	All	Annual review	21/09/2021	A. Webster
7	All	Annual review	04/05/2022	R. Thompson
8	All	Annual review	02/05/2023	R. Thompson
9	All	Annual review	26/03/2024	R. Thompson
10	All	Full annual review & inclusion of Progress Since Last Year	16/07/2025	K. Baczkowski
11	All	Annual Review	08/04/2026	K. Baczkowski

To be reviewed annually as a minimum

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1. Managing Director's Introduction

Slavery and human trafficking remain pervasive issues in today's global society, often concealed within supply chains. At Stanningley Engineering Ltd, we recognise our duty to remain vigilant, regardless of the scale of risk, across our operations and broader supply network. All staff are expected to report any concerns, and our management is committed to investigating and addressing them.

Modern slavery is a serious crime and a breach of fundamental human rights. It encompasses various practices, including slavery, forced labour, and human trafficking, all of which involve the exploitation of individuals through coercion or control. Stanningley Engineering Ltd maintains a zero-tolerance stance on such practices. We are committed to conducting all business ethically and with integrity, implementing robust systems to prevent modern slavery within our organisation and supply chains.

2. Company Structure

Founded in 1983, Stanningley Engineering Ltd is a family-run business delivering high-quality, cost-efficient mechanical and civil engineering solutions to the Utilities sector. Our annual turnover exceeds £4.4 million.

3. Our Business Divisions

We operate across three core business units:

- Mechanical Engineering
- Civil Engineering
- Electrical and Instrumentation (E&I)

4. Supply Chains

Our supply chains primarily involve the procurement of raw materials relevant to our mechanical and civil engineering services.

5. Anti-Slavery and Human Trafficking Policy

We are firmly committed to eliminating modern slavery and human trafficking from our operations and supply chains. Our Anti-Slavery Policy reflects this commitment and is supported by systems and controls that promote ethical conduct and transparency.

6. Child Labour

Stanningley Engineering Ltd will not engage with any organisation, directly or indirectly, where child labour may be present in the supply chain.

As outlined by UK law:

- The minimum age for part-time work is 13, except in fields such as acting or modelling.

- Children may begin full-time work after reaching the school-leaving age, with a 40-hour weekly limit.
- PAYE requirements begin at age 16.
- Full adult employment rights apply from age 18.
- Individuals under 18 must continue part-time education or training until age 18.

Restrictions include:

- No employment without a local authority permit (where required).
- Prohibition from working on industrial sites or in factories.
- No work during school hours or outside 7am–7pm.
- Limits to work duration and break periods.
- Protection from any task that may harm health, education, or well-being.
- A mandatory two-week break from work during school holidays annually.

For full regulations, refer to: gov.uk

7. Due Diligence

To manage and reduce risk, we apply the following measures:

- Restricting our operational geography to ensure strong supervision.
- Building lasting relationships with suppliers and clarifying expected conduct.
- For national and international supply chains, we engage primarily with UK-based entities and expect them to uphold anti-slavery policies and cascade due diligence down their supply chains.
- Encouraging the reporting of concerns and protecting whistle-blowers.

8. Supplier Compliance

We uphold zero tolerance toward slavery and human trafficking and expect all suppliers and contractors to reflect our values. Directors and Project Managers are accountable for ensuring compliance within their areas and for maintaining ethical supplier relations.

9. Policy Compliance

It is essential that all team members read, understand, and adhere to this policy. Preventing and reporting instances of modern slavery is everyone's responsibility. Activities that may breach this policy must be avoided, and any suspicion of non-compliance must be reported to SEL management immediately.

10. Measuring Effectiveness

We monitor our performance using the following key indicators:

- Pre-engagement supplier and contractor assessment questionnaires.
- Labour monitoring and payroll system checks.
- Direct communication and relationship-building with supply chain partners to ensure policy awareness and compliance.

11. Progress Since Last Year

Over the past 12 months, Stanningley Engineering Ltd has taken measurable steps to strengthen our commitment to preventing modern slavery and human trafficking:

- **Enhanced Supplier Vetting**: All new suppliers are now required to complete a detailed compliance questionnaire prior to engagement.
- **Policy Integration**: Our Anti-Slavery Policy has been embedded into onboarding materials, ensuring consistent awareness across all departments.
- **Whistleblower Support**: We launched an anonymous reporting channel and updated our internal guidance to better protect whistleblowers.

12. Policy Violations

Employees who violate this policy may face disciplinary action, including dismissal for misconduct. Our organisation also reserves the right to terminate partnerships with individuals or entities found in breach of this policy.

This statement is issued in accordance with section 54(1) of the Modern Slavery Act 2015 and represents our slavery and human trafficking statement for the current financial year.

M Robinson
Operations Director
Stanningley Engineering Ltd.