

## **Modern Slavery and Human Trafficking Statement**

### **1. Introduction**

Oleja Construction Ltd is committed to conducting business responsibly and ethically. We take a zero-tolerance approach to modern slavery, human trafficking, forced labour, and exploitation of any kind within our operations and supply chains.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps we have taken to prevent modern slavery and human trafficking in our business and supply chains.

### **2. Our Business and Supply Chains**

Oleja Construction Ltd is a UK-based construction and project management company, operating in residential and commercial development, refurbishments, and building services.

Our supply chains include:

Labour and subcontractors

Material suppliers

Plant hire and equipment providers

Professional service consultants

We understand that the construction sector carries a higher risk of modern slavery, particularly within temporary labour, subcontracted work, and international material sourcing.

### **3. Policies in Relation to Modern Slavery**

We have implemented the following policies and procedures to prevent modern slavery:

Anti-Slavery and Human Trafficking Policy

Code of Conduct for Employees and Subcontractors

Supplier Code of Conduct

Right to Work and ID Verification Procedure

Whistleblowing Policy

All staff, contractors, and suppliers are expected to comply with these policies and uphold ethical standards.

### **4. Due Diligence and Risk Management**

We conduct due diligence when engaging new suppliers and subcontractors, including:

Verifying legal working status of all labour

Reviewing subcontractor compliance with UK employment law

Assessing risk based on sector, geography, and service type

Monitoring for signs of exploitation on-site

#### 5. Training and Awareness

Oleja Construction Ltd is committed to raising awareness of modern slavery risks. We provide:

Induction training on modern slavery for all new staff

Annual refreshers and toolbox talks for site operatives

Guidance for managers on identifying and reporting concerns

#### 6. Monitoring and Reporting

We encourage employees and partners to report any suspicions of modern slavery. Reports are investigated in line with our grievance and whistleblowing procedures. No incidents have been reported to date.

#### 7. Our Commitments for 2025–2026

Expand supplier audits for higher-risk categories

Update due diligence processes for subcontractor onboarding

Review all policies annually for effectiveness

Increase engagement with ethical sourcing initiatives

#### 8. Approval

This statement has been approved by the Directors of Oleja Construction Ltd and will be reviewed annually.

Signed:

Edvinas Sadeikis

Managing Director

Oleja Construction Ltd

Date: 1 August 2025