

Introduction

Integra Buildings Ltd is steadfast in its commitment to operating ethically and transparently while upholding human rights across all aspects of its business. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and outlines the measures we have implemented to prevent modern slavery and human trafficking within our operations and supply chains. Our approach reflects our alignment with UK legislation, Health and Safety Executive (HSE) guidance, and best practices recommended by secondary bodies such as the Gangmasters and Labour Abuse Authority (GLAA) and Integra Buildings Ltd has signed up to the Better Hiring Charter.

Our Business and Supply Chain

Integra Buildings Ltd is a leader in modular construction, delivering innovative solutions across multiple sectors. Our operations involve direct construction activities as well as a comprehensive supply chain comprising subcontractors, suppliers, and service providers. Significant projects, such as our work for the UK Parliament and the 5 Basin East Wall Centre (5BEWC) Berth Access Building (BAB), underscore the scale and complexity of our operations.

Policies and Governance

To safeguard against modern slavery and unethical practices, we have established robust policies and governance frameworks, including:

1. **Ethical Procurement Policy:** Compliant with Procurement Policy Note (PPN) 01/22 and PPN 06/21, we ensure our supply chain aligns with UK government sanctions against Russia and Belarus and broader sustainability and ethical requirements.
2. **SHEQ Management System:** Through our Safety Culture system and QR code reporting mechanisms, we maintain accountability and transparency in Safety, Health, Environment, and Quality (SHEQ) compliance.
3. **Whistleblowing Policy:** We empower employees, suppliers, and other stakeholders to report concerns, including suspected cases of modern slavery or unethical practices, in confidence.
4. **Anti-Slavery and Human Trafficking Policy:** This standalone policy underpins our commitment to eradicating forced labour and sets clear standards for our operations and suppliers.

Risk Assessment and Due Diligence

We adopt a proactive and systematic approach to identifying and mitigating modern slavery risks within our operations and supply chain by:

- Conducting regular supplier audits in alignment with ISO 9001 (Quality Management), ISO 14001 (Environmental Management), and ISO 45001 (Occupational Health and Safety Management) standards.
- Assessing suppliers' adherence to the Modern Slavery Act 2015, the Ethical Trading Initiative Base Code, and principles outlined by the International Labour Organization (ILO).
- Evaluating labour & employment practices within our supply chain, particularly in high-risk sectors and geographies.
- Monitoring compliance with relevant HSE guidelines on workplace safety and labour standards.

Training and Awareness

To foster a culture of ethical awareness and compliance, we provide comprehensive training for employees and supply chain partners, focusing on:

- Identifying and addressing signs of modern slavery and human trafficking.
- Understanding the legal and ethical obligations under the Modern Slavery Act 2015.
- Promoting human rights and ethical labour practices in construction operations.

Collaboration with External Bodies

We actively engage with secondary bodies and initiatives to enhance our anti-slavery efforts, including:

- Collaborating with the GLAA to adopt best practices in preventing labour exploitation.
- Partnering with Stronger Together to improve awareness and mitigation strategies across our workforce and supply chain.
- Participating in industry forums to share knowledge and advance collective solutions to combat modern slavery.

Measuring Effectiveness

To ensure the effectiveness of our approach, we regularly review and improve our systems and processes, including:

- Conducting periodic supplier assessments and audits.
- Reviewing reports from the SHEQ system to identify and address potential risks.
- Tracking key performance indicators (KPIs) related to ethical compliance and modern slavery prevention.

Future Commitments

Integra Buildings Ltd is dedicated to continual improvement in our efforts to combat modern slavery. Our future priorities include:

- Strengthening our supplier onboarding process to include enhanced due diligence on labour practices.
- Expanding partnerships with industry bodies and non-governmental organisations to access the latest resources and guidance.
- Increasing the frequency and scope of training programs to reach all levels of our organisation and supply chain.

This statement has been approved by the board of directors of Integra Buildings Ltd and will be reviewed annually to ensure it reflects our ongoing commitment to eliminating modern slavery and human trafficking.



Gary Parker
CEO
January 2025