

## **Trident Lifting Solutions**



Policy Statement - Trident Lifting Solutions Limited ("Trident", "the Company")

Trident Lifting Solutions Limited is committed to high standards of professional conduct, integrity and accountability. As a specialist lifting and crane solutions provider operating in safety-critical environments, we recognise that the behaviour and standards of our people are fundamental to building a strong, respectful culture and protecting our reputation as a trusted industry leader.

We expect everyone working for or on behalf of the Company to act with professionalism, respect and responsibility at all times, reflecting our values and supporting a positive working environment. Clear standards of behaviour are essential to ensure safety, quality and effective collaboration across our projects and teams.

### **1. Purpose**

Trident Lifting Solutions Limited ("Trident", "the Company") is committed to ensuring that modern slavery and human trafficking do not occur in our business or supply chains. This policy sets out how we prevent, identify and deal with those risks.

It aligns with the Modern Slavery Act 2015, including the section 54 transparency duty where it applies, and with Home Office statutory guidance on modern slavery statements issued on 27 March 2025. That guidance did not change section 54 itself, but it raised expectations on quality, specificity, and how organisations explain risk and impact.

This policy is the internal rulebook. Where Trident is required to publish an annual Modern Slavery and Human Trafficking Statement, that statement will describe the steps taken during the relevant financial year and will be approved by the Board.

### **2. Scope**

This policy applies to all individuals and organisations working for or with Trident, including: employees, directors, officers and workers;

agency staff, consultants, contractors, subcontractors and labour providers;

suppliers, manufacturers, hauliers, plant providers and professional advisers; and

any other business partner performing services for or on behalf of Trident.

It covers all Trident operations: offices, yards, workshops, client sites, project locations and any work carried out in the supply chain that supports our lifting and crane activities.

### **3. Definitions**

Modern slavery: slavery, servitude, forced or compulsory labour, and human trafficking, including child labour used in those circumstances.

Human trafficking: the recruitment, transportation, transfer, harbouring or receipt of persons by threat, force, coercion, abduction, fraud, deception, abuse of power or vulnerability, for the purpose of exploitation.

Labour exploitation: underpayment, unlawful deductions, withholding of identity documents or wages, excessive hours, debt bondage, or work obtained through intimidation.

Supply chain: labour providers, specialist subcontractors, crane and plant suppliers, equipment and steel manufacturers, transport and logistics, materials suppliers, PPE suppliers and professional services.

Associated person: any person who performs services for or on behalf of Trident, including a supplier or subcontractor.

## **4. Policy statement**

Trident takes a zero-tolerance approach to modern slavery and human trafficking. We will act ethically and with integrity in all business dealings and require the same standard from anyone who works with us.

We will:

assess risk in our operations and supply chain and apply controls that are proportionate to that risk;

check that workers are engaged lawfully, paid correctly and free to leave their work;

require suppliers and contractors to meet equivalent standards and give Trident a right to audit;

train relevant staff to spot warning signs and to report concerns;

protect people who speak up in good faith; and

investigate concerns promptly, protect anyone affected, and take contractual or disciplinary action where needed.

We will not work with any organisation we know to be involved in modern slavery. Where a concern arises we will put the safety and wellbeing of the affected individual first.

## **5. Our business and where risk arises**

Trident is a UK specialist lifting and crane solutions provider operating in safety-critical construction and engineering environments. Work is delivered through our own employees and through subcontractors, agency labour, plant providers and equipment suppliers.

We recognise that modern slavery risks in this sector can arise through:

labour exploitation via subcontracting and labour agencies, including multi-tier labour on client sites;

underpayment, unlawful deductions, withheld holiday pay or excessive working hours;

coercion, intimidation, retention of passports or bank cards, or workers who cannot evidence their own right to work;

tied accommodation or transport that a worker cannot realistically refuse;

upstream risks in manufactured lifting equipment, steel, chain, wire rope, hydraulics and other imported materials; and

transport, logistics and facilities services used to support projects.

Risk varies by labour model, geography, commodity or material category, and how many subcontract layers sit between Trident and the person doing the work. Higher attention will be given to labour-only supply, new suppliers, overseas manufacture, and any category where previous concerns have arisen.

## **6. Responsibilities**

### **6.1 Board of Directors**

The Board is accountable for this policy, for understanding modern slavery risk, and for approving any annual section 54 statement. It will make sure the policy is resourced and reviewed.

## 6.2 Directors and senior managers

Directors and senior managers must embed the policy in bidding, procurement, mobilisation and site management. They must not approve a supplier or labour arrangement where due diligence has not been completed to the required standard.

## 6.3 Procurement, commercial and operations

These teams own supplier onboarding, contractual clauses, category risk assessment, site-level labour checks and escalation when a risk indicator appears.

## 6.4 HR

HR owns right-to-work and recruitment controls, worker welfare concerns raised internally, training records, and coordination with the Whistleblowing Policy.

## 6.5 All workers

Everyone working for or with Trident must follow this policy and report concerns. Failure to report a known or reasonably suspected incident may itself be treated as a breach.

## 7. Risk assessment

Trident will assess modern slavery risk in its own operations and in the supply chain on a regular basis, and whenever a new high-risk category, geography or labour model is introduced.

The assessment will consider:

- the type of work and whether it is labour-intensive or low-skilled;
- use of agencies, gangmasters or multi-tier subcontracting;
- country of origin for equipment and materials;
- known sector or geographic risk;
- payment practices, working hours and welfare arrangements; and
- previous incidents, audit findings or client requirements.

High-risk areas will be recorded, monitored and reviewed by senior management. Findings will feed the annual statement where one is published.

## 8. Recruitment and our own workforce

Trident will not use forced labour, child labour or bonded labour. For people we engage directly we will: complete right-to-work checks before work starts, in line with the Right to Work Policy;

pay at least the applicable National Minimum Wage or National Living Wage and the contractual rate;

not charge workers a fee for a job, and not deduct pay except where the law allows;

not hold original identity documents;

set hours in line with the Working Time Regulations and the Fatigue Management Policy; and

use only approved labour providers that have been through due diligence.

If a worker appears frightened, cannot produce their own documents, is collected and paid through an unexplained third party, or shows other exploitation indicators, managers must stop and escalate to HR the same day.

## 9. Supplier due diligence and contracts

Trident applies a risk-based approach to supplier due diligence. Where proportionate this includes:

onboarding checks and a modern slavery / labour-standards questionnaire;

confirmation of right-to-work, PAYE or genuine self-employment arrangements for labour suppliers;

contractual obligations to comply with the Modern Slavery Act 2015, this policy and applicable wage and working-time law;

a right for Trident to audit, to request worker records, and to visit site or premises;  
a duty on the supplier to flow the same obligations down to their own subcontractors;  
category-level risk assessment for plant, equipment, steel and imported goods; and  
targeted engagement and corrective action where a risk indicator appears.

Trident may refuse to onboard, suspend or terminate a supplier that will not complete due diligence, that fails an audit, or that cannot show lawful labour practices. For public-sector work commencing on or after 24 February 2025, supplier assurance will also take account of the Procurement Act 2023, including exclusion grounds linked to relevant offences.

Where goods in the chain may be placed on the EU market, Trident will have regard to the EU Forced Labour Regulation (EU) 2024/3015, which prohibits products made with forced labour and is expected to apply from December 2027.

## **10. Site and project controls**

On projects where Trident controls or influences labour, site teams will:  
confirm who employs each worker and that induction and right-to-work evidence are in place;  
watch for signs of exploitation during induction, hours monitoring and welfare checks;  
not accept cash-in-hand labour or unnamed operatives supplied at short notice without checks;  
raise immediately if wages appear to be paid to someone other than the worker, or if a worker is being housed or transported in conditions that suggest control by a third party; and  
cooperate with client or principal-contractor modern slavery inspections.

## **11. Training and awareness**

Trident will train relevant employees so they can recognise modern slavery and know how to report it.

Training will cover:

what modern slavery and labour exploitation look like in lifting, construction and logistics;  
indicators such as withheld documents, someone else speaking for the worker, unusual payment routes, or workers who owe a debt for their job;  
how to report and escalate; and  
what procurement and commercial staff must obtain from suppliers before engagement.

Induction will introduce this policy. Additional training will be given to managers, buyers, site supervisors and anyone who onboards labour. Attendance will be recorded.

## **12. Reporting and whistleblowing**

Anyone may report a concern — employees, agency workers, suppliers, site labour and members of the public. Reports can be made to:

a line manager or site supervisor;

HR;

a director; or

the confidential whistleblowing route in the Whistleblowing Policy.

Reports may be made anonymously. Trident will not subject anyone to dismissal, victimisation or any other detriment for raising a genuine concern. False or malicious allegations may be dealt with under the Disciplinary Policy.

If someone is in immediate danger, the police should be called on 999. The Modern Slavery helpline (0800 0121 700) and the Gangmasters and Labour Abuse Authority remain available as external routes.

## **13. Investigation and remediation**

Where a concern is identified Trident will:

prioritise the safety and wellbeing of anyone who may be affected;

investigate promptly and fairly, preserving evidence;

engage specialist support and notify the police, GLAA or other authorities where required;

require corrective action from the supplier, including repayment of withheld wages where that is appropriate;

take proportionate contractual action, up to suspension or termination; and

review whether the same risk exists elsewhere in the supply chain.

Workers who may have been exploited will not be treated as the problem. Where they are Trident employees, HR will manage welfare, pay and right-to-work issues separately from any supplier action.

#### **14. Effectiveness and continuous improvement**

Trident will judge whether this policy is working through internal review, supplier engagement, training coverage, incident themes and lessons learned. For each review period we will aim to record:

priority risk areas and the actions taken;

supplier questionnaires, audits and outcomes;

training completed by relevant roles; and

concerns received and how they were handled.

Those measures will also support any section 54 statement the Board approves.

#### **15. Legal and regulatory context**

Modern Slavery Act 2015, including the section 54 transparency in supply chains duty where turnover and tests are met.

Home Office statutory guidance on section 54 statements (updated 27 March 2025).

Procurement Act 2023 for in-scope public contracts commencing on or after 24 February 2025.

EU Forced Labour Regulation (EU) 2024/3015, expected to apply from December 2027 where relevant to goods on the EU market.

Related UK law including the Employment Agencies Act, Gangmasters (Licensing) Act where applicable, National Minimum Wage legislation, Working Time Regulations and the Immigration Act right-to-work regime.

#### **16. Related policies**

Human Rights Policy;

Whistleblowing Policy;

Anti-Bribery and Anti-Corruption Policy;

Anti-Fraud Policy;

Right to Work Policy;

Recruitment Policy;

Contractor Management Policy;

Corporate Social Responsibility Policy;

Disciplinary Policy; and

any Supplier or Contractor Code of Conduct issued by Trident.

**17. Compliance and consequences**

A breach of this policy may result in disciplinary action up to and including dismissal, removal from site, termination of a supplier contract, and referral to the police or another authority. Trident will cooperate with any lawful investigation.

**18. Review and approval**

This policy is non-contractual and may be amended by Trident. It will be reviewed at least annually, or earlier if the law, Home Office guidance or Trident's operating model changes.  
Approved by the Board of Directors of Trident Lifting Solutions Limited.

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**AUTHORISED AND SIGNED**

**SIGNED**



Chris Conway  
**Director**

**Review:**            **Annually**  
**Date:**             **28/08/2026**  
**Next Review:**   **28/08/2027**

**SIGNED**



Martina Oyite  
**Chief People Officer**

**Review:**            **Annually**  
**Date:**             **28/08/2026**  
**Next Review:**   **28/08/2027**