

The Directors and Managers of Foundation Developments Limited (FDL) recognise that Modern Slavery and Human Trafficking is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

FDL have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 which we abide by.

We demand the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

### **1.0 Responsibilities for the policy**

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

### **2.0 Compliance with the policy**

All persons working for FDL must read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All persons working for FDL are required to avoid any activity that might lead to, or suggest, a breach of this policy.

All persons working for FDL are encouraged to raise suspicions that may conflict with this policy.

### **3.0 Communication, Training & Awareness of this policy**

This policy will be communicated directly to all FDL employees during their initial company induction, following which further training and updates will be made available via the company intranet. In addition to the internal training, employees will be sign-posted to external resources when appropriate.

FDL employees are required to communicate our zero-tolerance approach to modern slavery to **all** suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### **4.0 Breaches of this policy**

Any breach of this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

This policy statement shall be reviewed at least annually by all interested parties and shall be communicated and made available to employees and any other interested parties upon request. The policy is to be briefed to all employees during induction and following review.



P. Hickey  
Managing Director

Date: January 2026