

Modern Slavery and Human Trafficking Policy

Key Responsibilities

Capital Sky takes its responsibilities in respect of modern slavery and human trafficking seriously. We are committed to acting ethically and with integrity in all our business dealings and relationships. We comply with all statutory obligations and ensure legal compliance and transparency in respect of our employment relationships.

Modern slavery is a serious crime and a violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour, and human trafficking.

We are committed to playing our part in eradicating this modern-day crime, which has been described as criminality hidden in plain sight. Government research has estimated the cost to the UK economy to be between £3.3bn and £4.3bn.

We present this statement as required by Section 54 of the [Modern Slavery Act 2015](#). This statement has been approved by the Capital Sky Board of Directors.

As the Director with full responsibility, I am proud to present this public statement of our position. This is a live policy that reflects our culture and ongoing development and will be reviewed and updated annually.

This policy is also available to view on the Capital Sky website.

Capital Sky Ltd has been created with a wealth of experience in demolition, construction and civil engineering. The management team has extensive experience delivering specialist projects and managing project teams from pre-construction through to handover. The management team has received numerous awards for safety, environmental performance, and quality, as well as successful project delivery.

Our Supply Chain

Capital Sky will work to prevent modern slavery and human trafficking within our subcontractors and supply chains by reducing risks and actively influencing behaviours within directly contracted organisations.

We expect all suppliers and subcontractors to operate in full compliance with the [Modern Slavery Act 2015](#) and to adopt equivalent standards within their own operations and supply chains.

Any failure to comply with these requirements, or any suspected breach of the Act that could impact Capital Sky's reputation or legal obligations, may be investigated and could result in corrective action, up to and including removal from our supply chain.

Capital Sky management, employees, and subcontractors are responsible for ensuring compliance with these requirements.

Due Diligence and Risk Management

As part of our efforts to monitor, manage, and reduce the risk of modern slavery and human trafficking occurring within our business or supply chains, we apply the following due diligence procedures:

Our processes aim to:

- Identify, assess, and manage areas of potential risk within our business and supply chains
- Scrutinise any identified high-risk suppliers or activities
- Maintain a zero-tolerance approach to modern slavery and human trafficking throughout our organisation and supply chains
- Provide protection and support to any person who raises genuine concerns in good faith under whistleblowing procedures

Training and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking within our business and supply chains, we provide appropriate training to relevant staff.

We also expect our suppliers to ensure that their employees are made aware of modern slavery risks and have access to appropriate training where necessary.

To demonstrate effectiveness, we review supply chain feedback annually in relation to modern slavery risks to ensure that slavery and human trafficking are not taking place in any part of our business or supply chains.

We also monitor industry updates, regulatory guidance, and relevant publications to maintain awareness of emerging risks.

Further Steps and Continuous Improvement

Capital Sky is committed to continuously reviewing the effectiveness of the steps we take to ensure that modern slavery and human trafficking are not present in our operations or supply chains.

We will continue to strengthen supplier due diligence, training, and monitoring processes as part of our ongoing improvement programme.

Approval

This statement is made in accordance with Section 54(1) of the [Modern Slavery Act 2015](#) and constitutes Capital Sky's anti-slavery and human trafficking statement for the current financial year. It has been approved by the Capital Sky Board of Directors.

Name: Martin Maloney

Position: Chief Executive Officer

Signature:



Dated: 15/05/2026

Latest Review Date: 15/05/2027