

# ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

## Introduction

Dr. Sauer & Partners Ltd recognises and welcomes the Modern Slavery Act 2015 and the duty it places on large organisations to disclose publicly the steps they are taking to prevent modern slavery within the business and their supply chains. Dr. Sauer & Partners Ltd has a zero-tolerance approach to modern slavery and is committed to improve its practices by acting ethically and with integrity to ensure that modern slavery and human trafficking does not exist anywhere within the organisation or is in anyway associated with the business.

## Our business

Dr. Sauer & Partners Ltd is a UK SME business that has been providing tunnelling solutions to the construction industry for over 30 years. We are an engineering consultancy for civil engineering, tunnelling and geotechnical design. Our head office is based in Surbiton, Surrey where many of our employees are based, we also operate out of client offices within the Central London region.

## Due diligence, risk assessment and auditing

Dr. Sauer & Partners Ltd considers its position within the construction industry as low risk in relation to modern slavery. The company recognises that although comprehensive practices are in place to ensure that modern slavery does not exist within direct recruitment and employment, the very nature of the business is complex when considering the use of sub-contractors and extended supply chain. Dr. Sauer & Partners Ltd insists that all large companies associated with the business adhere to section 54 of the Modern Slavery Act and that smaller companies abide by the principles and policies in operation. Accordingly, Dr. Sauer & Partners Ltd expects its sub-contractors to ensure that modern slavery also does not exist within their own supply chain. Where issues are identified that are not resolved to our satisfaction, we review the on-going nature of the relationship with that relevant organisation.

## Our policies and procedures

Dr. Sauer & Partners Ltd adopt many procedures that assist with our management of potential modern slavery and human trafficking issues, details of which can be found within our bespoke Employee Handbook. These procedures are located within the following sections: Pre-Employment Checks, Public Interest Disclosure (Whistle-Blowing) and Corporate Social Responsibility Statement. In order to address modern slavery directly, Dr. Sauer & Partners Ltd is implementing a dedicated Modern Slavery Policy that sets out the company's position in relation to modern slavery. The policy is designed to set out the requirements the company has on entering into contractual relationships with others and ensures that its employees are aware of their responsibilities in working to ensure modern slavery does not exist anywhere within the company. Dr. Sauer & Partners Ltd is committed to training its employees to recognise potential situations of modern slavery and procedures to report their concerns. Training is provided at induction and refresher training via seminars, staff meetings and tool box talks.

## Moving forward

Dr. Sauer & Partners Ltd is committed to ensure modern slavery does not exist within its organisation by improving its current practices, adapting existing procedures, creating new policy and continuing to educate its employees. The Partners have set targets for the forthcoming year which include the following;



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- To formulate and issue company-wide a dedicated 'Modern Slavery and Human Trafficking' policy, this to be included within the Employee Handbook.
- To adapt and improve existing key policies and procedures as necessary to address modern slavery issues.
- To provide refresher training for our employees on identifying any potential unlawful or unethical conduct within our operations and supply chain and how to report their concerns.
- To ensure that all applicable sub-contractors have a signed statement and policy to abide by the Modern Slavery Act or for smaller organisations to agree to comply with the policy and procedures of Dr. Sauer & Partners Ltd.
- To audit our policies and procedures to ensure effectiveness and best practice in addressing risk of modern slavery within our operations.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Dr. Sauer & Partners Ltd.'s modern slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2025.

This statement was approved by Dr. Sauer & Partners Ltd.'s Managing Director on 1<sup>st</sup> January 2025.

Brian Lyons  
Dr. Sauer & Partners Limited

