



**DORNAN**  
A Turner Company

Dornan Engineering Limited its Subsidiaries and Branches  
Hereafter for the purpose of this Policy known as **Dornan**

# **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**



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# **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

## **1. INTRODUCTION**

Dornan maintains a zero-tolerance approach to all forms of modern slavery and human trafficking. We categorically condemn these practices as criminal acts and fundamental violations of human rights. Dornan is committed to ensuring that every individual is treated with dignity and respect across all our operations, whether we are competing for or delivering projects, regardless of location.

This Policy applies to all recognised forms of modern slavery, encompassing slavery, human trafficking, forced labour, bonded labour, and child labour. These practices share a common thread: the deprivation of a person's liberty for the purpose of exploitation, whether for personal or commercial gain. Dornan is resolute in its opposition to such crimes.

We are committed to conducting our business ethically and with integrity. To that end, we implement and enforce robust systems and controls to prevent modern slavery from taking place within our own operations or across our supply chains.

Transparency is central to our approach. We strive to maintain openness in our business practices and in how we address modern slavery risks throughout our supply chain. This commitment aligns with our obligations under relevant legislation, as well as Dornan's internal policies and procedures.

We expect the same high standards from all those we work with, including contractors, suppliers, and other Business Partners. As part of our procurement and contracting processes, we include explicit prohibitions against the use of forced, compulsory, or trafficked labour, and against any form of slavery, whether involving adults or children. We also expect our suppliers to apply these standards across all the businesses and partners they work with.

Dornan is committed to aligning its practices with the highest international standards on human rights and labour protections. In anticipation of the forthcoming EU Regulation banning products made with forced labour, expected to come into effect in 2027, Dornan is proactively reviewing and strengthening its due diligence processes across all the businesses and partners Dornan works with. This reflects our ongoing commitment to ethical sourcing and the prevention of modern slavery and human trafficking in all forms.

Also, our approach is guided by key international and regional anti-slavery and human trafficking instruments, including but not limited to:

- Criminal Law (Human Trafficking) Act 2008;
- Criminal Law (Human Trafficking) (Amendment) Act 2013;
- Criminal Law (Sexual Offences) Act 2017;
- Directive 2011/36/EU;
- Modern Slavery Act 2015;
- EU Corporate Sustainability Due Diligence Directive (CSDDD).

Dornan is firmly committed to preventing any involvement in human rights violations and to taking prompt and effective action should any adverse impacts arise. This commitment is underpinned by our internal frameworks, including the Employee Code of Conduct, Code of Conduct for Business Partners, and Compliance Policy.

Through this Anti-Slavery and Human Trafficking Policy (the “Policy”), Dornan reaffirms its dedication to cultivating a culture grounded in respect, dignity, and accountability.

## **2. DEFINITIONS**

**Slavery** – deprivation of a person's liberty by an individual, group, or organization for the purpose of personal or commercial exploitation.

**Encompassing Slavery** – range of exploitative practices in which individuals are deprived of their freedom and subjected to control, coercion, or abuse for the purpose of exploitation. This includes, but is not limited to, traditional slavery, human trafficking, forced labour, bonded labour, and child labour. These practices share common elements of manipulation, restriction of liberty, and exploitation for personal, economic, or commercial gain.

**Human Trafficking** – is the recruitment, transportation, transfer, harbouring, or receipt of individuals through threats, force, deception, or abuse of power, with the intent to exploit them.

**Forced Labour** – is work performed involuntarily under the threat of punishment. It includes situations where individuals are compelled to work through violence, intimidation, or coercion.

**Bonded Labour** – process that occurs when individuals or families are forced to work to repay high-interest debts, often under exploitative conditions and for little or no pay.

**Child Labour** – work that is mentally, physically, socially, or morally harmful to children. It interferes with their education and development, especially when it requires them to balance schooling with excessive or hazardous work.

### **3. SCOPE**

This Policy applies across all Dornan operations and to all entities under Dornan's management and control. It is binding on all directors, executives, and employees throughout Dornan.

Dornan requires all suppliers, subcontractors, and Business Partners to uphold the same uncompromising standards, including a zero-tolerance approach to all forms of modern slavery and human trafficking, as outlined in our Code of Conduct for Business Partners.

While Dornan complies with all applicable anti-slavery and anti-trafficking laws and regulations in the jurisdictions where it operates, in circumstances where local legislation is less stringent than the principles set forth in this Policy, Dornan will apply the highest internationally recognised standards to ensure the protection of human rights and the prevention of exploitation.

### **4. COMMITMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING**

Modern slavery and human trafficking are serious crimes and egregious violations of fundamental human rights. Dornan maintains a zero-tolerance approach to all forms of slavery and human trafficking within Dornan and throughout our supply chain.

Any failure to comply with this Policy, or any breach of its principles, will result in disciplinary action, up to and including termination of employment or contract. Employees, suppliers, and Business Partners are strictly prohibited from engaging in or facilitating any activity that could lead to a violation of this Policy. Furthermore, failure to report suspected or actual breaches will also be treated as a serious violation.

Dornan expects all individuals working on its behalf to fully support, uphold, and adhere to the measures outlined in this Policy. We rely on the active participation of our workforce and partners to help safeguard against the risks and practices associated with modern slavery and human trafficking.

We are committed to engaging with and supporting our stakeholders and suppliers in identifying, addressing, and mitigating the risks of modern slavery and human trafficking across all areas of our operations.

### **5. MEASURES**

Dornan conducts all business activities with the highest standards of ethics and integrity. We are committed to implementing and enforcing robust policies and procedures that establish effective controls to prevent any occurrence of slavery or human trafficking within Dornan or across our supply chain.



As part of our due diligence process, Dornan actively identifies and assesses potential risk areas when engaging with new suppliers. All prospective suppliers and subcontractors are required to complete a comprehensive supplier assessment.

We strongly encourage all employees to report any suspected breaches of this Policy. Dornan is committed to protecting whistleblowers and ensuring that individuals who raise concerns in good faith do so without fear of retaliation.

As part of our commitment to identifying and supporting potential victims, Dornan strives to remain vigilant for signs that may indicate a person is subject to slavery or human trafficking. Indicators may include, but are not limited to, individuals who:

- Are not in possession of their own passport, identification, or travel documents;
- Appear to be under the control or influence of another person;
- Are regularly dropped off and collected from work by someone else;
- Exhibit signs of anxiety, withdrawal, or fearfulness;
- Seem unable to freely contact friends or family;
- Have limited social interaction or contact outside their immediate environment;
- Show signs of physical abuse, such as bruises, untreated injuries;
- Live in poor or overcrowded conditions, often with many unrelated individuals;
- Have little or no access to money, or their wages are withheld;
- Are unable to leave their work environment, or works excessively long hours without breaks;
- Are unaware of their location, or lacks knowledge of the local area or language;
- Are accompanied by someone who speaks for them, even when directly addressed;
- Lack access to medical care, or avoids seeking help even when clearly unwell;
- Appear to be under surveillance, or is restricted in their movement or communication.

Dornan is dedicated to raising awareness, providing training, and fostering a culture of responsibility to help identify and prevent exploitation in all its forms.

## **6. RESPONSIBILITIES**

Every employee serves as a representative of Dornan to colleagues, clients, potential clients, business partners and community members. As an employee of Dornan, your words and actions reflect directly upon how you and Dornan are perceived. You are obligated to act with honesty, integrity, transparency and follow the rules and guidance in this Policy.

You are required, as a condition of your employment, to become familiar with, know, understand, and agree to follow this Policy.

If you have any questions or concerns about the Policy and its meaning, please send an email to [compliance@dornangroup.com](mailto:compliance@dornangroup.com).

#### **6.1. ACCOMMODATION AND LIVING CONDITIONS**

Where housing is provided Dornan ensures safe, clean, and dignified living conditions, including access to water, sanitation, electricity, communication, and personal privacy. We require our Business Partners who are providing accommodation to their workers to ensure they are upholding the same standards.

### **7. DUTY TO REPORT**

#### **7.1. DUTY TO REPORT VIOLATIONS**

All employees of Dornan have a responsibility to report breaches of this Policy as quickly as possible through Dornan's Protected Disclosure channel. This can be found on the Legal, Compliance and Data Protection page on Dornet.

Any known violations of the law or this Policy must be reported by the employee to their immediate manager and to the Legal, Compliance and Data Protection department.

The failure to report a known violation of the law or this Policy effectively condones the conduct in question and will be considered a violation of this Policy.

#### **7.2. DUTY TO REPORT CONTACTS**

Employees of Dornan are required to notify their supervisor and the Legal, Compliance and Data Protection department if they have received communication from any government or local authority regarding any issue related to Dornan's business, reputation, or operations.

This includes if an a request for interview, questioning or any other form of contact by a Government authority or official in regard to any matter that relates to Dornan, joint venture partners, subcontractors, vendors, clients or employees.

#### **7.3. COOPERATION IN INVESTIGATIONS**

There will be occasions when it is necessary for Dornan to investigate issues of concern or allegations regarding possible violations of this Policy or the law. These investigations are necessary to enable Dornan to determine whether there is legal risk.

Employees are required to cooperate with the individuals conducting the investigation. Employees are also expected to provide requested documents, answer questions honestly and in a forthright manner. Knowledge of any such investigations must be kept confidential



and may not be shared with others inside or outside of Dornan, unless given specific permission to do so by the Legal, Compliance and Data Protection department.

## **8. IMPLEMENTATION AND MONITORING OF THE POLICY**

Dornan consistently implements proportionate, risk-based measures to identify, prevent, and address actual or potential adverse human rights impacts across its operations and extended value chain.

This Policy will be clearly communicated and made accessible to all relevant employees and Business Partners, and will be publicly available on Dornan's official website.

This Policy is not a substitute for common sense and good judgment. If you are uncertain about the appropriate course of action, please speak with your manager. If the issue remains unresolved, contact the Legal, Compliance and Data Protection department at: [compliance@dornangroup.com](mailto:compliance@dornangroup.com).

## **9. REVIEW AND AMENDMENTS**

This Policy will be periodically reviewed and updated as necessary to ensure its effectiveness and compliance with relevant legal and regulatory requirements. Please contact [compliance@dornangroup.com](mailto:compliance@dornangroup.com) for any queries in relation to this Policy.