

ETHICS & SUPPLY CHAIN · MODERN SLAVERY ACT 2015

Modern Slavery Policy

Fair work, from supply chain to flight line.

How Drone Site Surveys Ltd prevents slavery, servitude, forced labour and human trafficking in our own team, our UK pilot network and the supply chain behind the drones, sensors and equipment we use.

Zero

tolerance of forced labour or exploitation

100%

of pilots vetted and approved before their first job

08000 121 700

Modern Slavery & Exploitation Helpline, 24/7

Annual

review, approved by the directors

ISSUED 22 October 2026	NEXT REVIEW 22 October 2027	APPLIES TO Staff, pilot network & suppliers
POLICY OWNER Francis Pybis, Director	APPROVED BY Anthony Carter, Director	LEGISLATION Modern Slavery Act 2015

ACCREDITED, APPROVED & INSURED



01 POLICY STATEMENT

Zero tolerance of modern slavery

Drone Site Surveys Ltd has a zero-tolerance approach to modern slavery. We will not knowingly work with anyone, in our own business or in our supply chain, who uses slavery, servitude, forced or compulsory labour, human trafficking or child labour. We expect the same standard from everyone who works with us.

We are an independent drone survey company based in Speke, Liverpool. Since 2019 we have carried out roof, façade, thermal and measured surveys across the UK for social housing providers, local authorities, schools, the NHS, rail and infrastructure owners, commercial landlords and construction teams. Many of these clients are public bodies and principal contractors who need to show that their own supply chains are free from modern slavery. This policy explains how we play our part.

WHY WE PUBLISH THIS POLICY

Section 54 of the Modern Slavery Act 2015 requires a slavery and human trafficking statement from organisations with an annual turnover of £36 million or more. We are below that threshold, so publishing this policy is voluntary. We publish it because our clients and their supply chains expect it, and because it is the right thing to do.

02 SCOPE

Who this policy applies to

This policy applies to everyone who works for us or on our behalf, wherever the work happens: at our head office in Speke, on client sites anywhere in the UK, or remotely.

**Directors and employees**

Our office, survey, data processing and reporting team.

**Our UK pilot network**

Self-employed pilots, thermographers and pilot companies who fly surveys on our behalf.

**Consultants and temporary workers**

Anyone we engage through an agency, on a fixed term or as a consultant.

**Suppliers and service providers**

Equipment, software, PPE, vehicles, travel and office services.

03 DEFINITIONS

What modern slavery means

Modern slavery is a crime under the Modern Slavery Act 2015. It covers:

Slavery and servitude	Holding a person in a position where they are treated as owned or controlled by someone else and cannot leave.
Forced or compulsory labour	Work or services a person has not offered freely and is made to do under the threat of a penalty, such as violence, threats against their family, or a debt they can never clear.
Human trafficking	Arranging or helping someone to travel, including within the UK, so that they can be exploited. It makes no difference whether the person agreed to travel.
Child labour	Work that harms a child's health, safety or education, or that is done by a child below the legal minimum working age.

Common warning signs include recruitment fees that leave workers in debt, identity documents held by an employer, wages paid to a third party, restricted freedom of movement, poor living conditions, and workers who seem frightened or controlled by someone else.

04 RISK ASSESSMENT

Where the risks are in our business

We are a small business with a short, mostly UK-based supply chain. We have looked at each part of it to see where modern slavery is most likely to occur, so that we can focus our effort where it matters most.

AREA	WHAT IT INVOLVES	RISK	HOW WE MANAGE IT
Drones, batteries, sensors and IT hardware	Drones, lithium-ion batteries, thermal cameras, LiDAR scanners, GNSS equipment and processing workstations. Most are made in Asia from minerals and components with known forced and child labour risks, such as cobalt, lithium and rare earths.	HIGH	Buy through authorised UK dealers, check supplier statements, keep and repair equipment rather than replacing it. See section 08
UK pilot network	Self-employed pilots, thermographers and pilot companies across the UK, booked for single jobs or longer survey programmes.	MEDIUM	Vetting before the first job, direct contracts and payment, no passing jobs on. See section 07
PPE and workwear	Hi-vis, safety boots, helmets, gloves and branded clothing. Textile and glove manufacturing has known forced labour risks.	MEDIUM	Established UK suppliers that publish a modern slavery statement. See section 08

AREA	WHAT IT INVOLVES	RISK	HOW WE MANAGE IT
Vehicles, travel and accommodation	Fuel, servicing, vehicle hire, hotels and car washes when our team travels to sites. Hand car washes and hospitality are recognised higher-risk sectors in the UK.	MEDIUM	Reputable providers; staff and pilots briefed on the warning signs. See sections 09 and 10
Client sites	Construction sites, housing estates, schools, hospitals and rail sites we visit to survey. Construction is a recognised higher-risk sector for labour exploitation.	MEDIUM	Our people know what to look for and how to report it. See section 10
Our directly employed team	Office, survey, data processing and reporting staff, all UK-based and employed directly by us.	LOW	Right-to-work checks, written contracts, pay through payroll. See section 06
Data processing and software	Photogrammetry, LiDAR processing, 3D and Revit models, CAD drawings, reports and our online client portal.	LOW	All processing and modelling is done in-house by our own team. Software comes from established vendors.
Office services	Cleaning, maintenance and other services at our Speke head office.	LOW	Established providers that pay at least the National Living Wage.

05 RESPONSIBILITIES

Who does what

The directors

Anthony Carter and Francis Pybis

Overall accountability for this policy. The directors approve it each year, make sure there is the time and money to put it into practice, and lead by example.

Modern Slavery Lead

Francis Pybis, Director

Owns this policy day to day: supplier and subcontractor checks, training records, handling concerns, the annual review and the compliance pack we provide to clients.

Chief Pilot

Anthony Carter, Director

Vets and approves every pilot before their first job, briefs field teams, and checks that flight records show only approved pilots fly for us.

Everyone who works for us

Staff, pilots, consultants and contractors

Read and follow this policy, complete the training, and report any concern straight away.

06 OUR PEOPLE

Fair recruitment and employment

We recruit and employ people fairly and legally. In practice, this means:

- ✓ We check every employee's right to work in the UK before they start, using original documents or the Home Office online checking service.
- ✓ Everyone has a written contract or written terms setting out their pay, hours and notice period, explained in plain English.
- ✓ We pay at least the National Living Wage or National Minimum Wage, through payroll, into each person's own bank account.
- ✓ We never charge recruitment fees, and we never keep anyone's passport, ID or other personal documents.
- ✓ Working hours follow the Working Time Regulations. Our flight safety procedures also require pilots to be rested and fit to fly, so nobody is pressured into working excessive hours.
- ✓ Anyone can leave their job by giving the notice in their contract, without penalty.
- ✓ Any recruitment agency we use must confirm in writing that it charges candidates no fees and follows the Conduct of Employment Agencies and Employment Businesses Regulations 2003.

07 PILOT NETWORK

Vetting and working with our pilots

Our network of qualified pilots lets us survey sites anywhere in the UK. Because these pilots are self-employed or work through their own companies, they go through specific checks before they fly for us, and we set clear rules for how we work together.

Before the first job

- ✓ Identity and right to work in the UK confirmed.
- ✓ CAA Flyer ID, Operator ID and the right competency certificate for the work (A2 CofC or GVC) checked and recorded.
- ✓ Insurance checked, plus CSCS card for construction sites and BINDT certification for thermal surveys where needed.
- ✓ Our vetting and training completed, including this policy and how to report a concern.

How we work together

- ✓ We contract directly with the pilot or their own company, never through unknown third parties or labour providers.
- ✓ Fees are agreed in writing before each job and paid in full, on time, into the pilot's own or their company's bank account.
- ✓ The pilot we approve is the pilot who flies. Jobs cannot be passed to anyone else without our agreement, and our flight logs record who flew each mission.
- ✓ Pilots can turn down work, or leave the network at any time, without penalty.

08 SUPPLY CHAIN DUE DILIGENCE

Buying responsibly

Most of the equipment we fly and process data with is made overseas. Lithium-ion batteries, drone motors, cameras and computer components depend on minerals such as cobalt, lithium and rare earths, and on factories where forced and child labour have been documented. As a small business we have little influence over large manufacturers, so we focus on buying responsibly and asking the right questions.

Checking new suppliers

Before we buy regularly from a new supplier in a medium or high-risk category, we check what they supply, where it is made, and whether they publish a modern slavery statement, using the GOV.UK modern slavery statement registry where it applies.

Authorised channels only

We buy drones, batteries, sensors and spares from manufacturers' authorised UK dealers and service centres, not from unknown online marketplace sellers. This also protects our operations from counterfeit batteries and parts.

Contract terms

Pilot agreements and our purchase terms require suppliers and subcontractors to comply with the Modern Slavery Act 2015, to tell us about any concern, and allow us to end the contract if they do not.

Buy less, keep longer

We maintain and repair our aircraft, batteries and sensors and keep them in service for as long as they are safe to fly, which reduces how much new hardware we buy.

IF WE FIND A PROBLEM

We review our key suppliers and all high-risk suppliers each year. If we find a concern, we will work with the supplier to put it right where we can. If a supplier will not cooperate, or the issue is serious, we will stop working with them and report it to the appropriate authorities.

09 TRAINING AND AWARENESS

Making sure everyone knows the signs

Everyone who works for us is trained to recognise modern slavery and knows how to report it. Training is recorded in our training records and checked at the annual review.

At induction

Every new employee and network pilot is taken through this policy, and how to report a concern, before their first job.

Every year

All staff and pilots take part in a modern slavery toolbox talk covering warning signs on site, in hotels and at car washes.

For the directors

The directors complete more detailed supply chain training, such as the Supply Chain Sustainability School's free modern slavery e-learning.

10 ON SITE

What to look out for on site

Our pilots and surveyors visit construction sites, housing estates, schools, hospitals, rail sites and private homes all over the UK, so they may see things that others do not. Our job is to survey buildings, not to investigate people: we never use our drones or thermal cameras to look for crime, and every flight follows our privacy procedures. But if something seen during a survey is worrying, it should be reported.

People

- Workers who seem frightened, withdrawn or controlled by someone else, or who are not allowed to speak for themselves.
- Workers without proper PPE or clothing for the job.
- Groups dropped off and collected at unusual times, or who appear to be living on site.
- Anyone who says someone else is holding their passport or ID, or that they owe a debt to their employer.

Places

- Properties that look overcrowded, or have windows covered, blacked out or boarded up.
- People living in sheds, outbuildings, vehicles or site cabins.
- Signs of cannabis cultivation, which is often linked to trafficking, such as covered windows, strong smells and unusual ventilation.
- Hand car washes or other premises where workers seem to be under someone's control.

1

Don't confront anyone or put yourself or others at risk.

2

If someone is in immediate danger, call **999**.

3

Tell the Modern Slavery Lead the same day.

4

Or call the helpline on **08000 121 700**, any time.

11 REPORTING CONCERNS

How to report a concern

If you think modern slavery may be happening in our business, our pilot network, our supply chain or on a site we visit, tell us. You don't need proof: a reasonable suspicion is enough. Employees, pilots, suppliers, clients and members of the public can all report a concern.

Tell us directly

Speak to Francis Pybis (Modern Slavery Lead) or Anthony Carter (Chief Pilot) on **0345 017 5592**, or email **info@dronesitesurveys.co.uk** marked "Private and confidential".

Or write to: Private and confidential, The Directors, Drone Site Surveys Ltd, 4A Hurricane Drive, Speke, Liverpool L24 8RL.

What happens next

We acknowledge every report within two working days and look into it promptly and in confidence. Where a crime may have been committed, we involve the police or other authorities, and we tell you the outcome where we can.

No one will suffer any detriment for raising a genuine concern, even if it turns out to be mistaken. Workers are also protected by whistleblowing law under the Public Interest Disclosure Act 1998.

PREFER TO REPORT OUTSIDE THE COMPANY?

Free, confidential help is available

MODERN SLAVERY & EXPLOITATION HELPLINE

08000 121 700

Free and confidential, 24 hours a day

CRIMESTOPPERS

0800 555 111

Report anonymously

POLICE

999 or 101

999 if someone is in immediate danger, 101 if not urgent

12 BREACHES

If this policy is broken

We take any breach of this policy seriously.

- ✓ **Employees** may face disciplinary action, up to and including dismissal.
- ✓ **Pilots and suppliers** may be suspended from work while we investigate, and may have their contract ended or be removed from our pilot network.
- ✓ Where a crime may have been committed, we will report it to the police.

13 KEY PERFORMANCE INDICATORS

How we measure progress

We track the following measures and report them to the directors at each annual review.

MEASURE	TARGET
New employees and pilots taken through this policy before their first job	100%
Staff and network pilots who attended a modern slavery toolbox talk in the last 12 months	100%
New pilots vetted and approved before their first flight	100%
Key and high-risk suppliers reviewed during the year	100%
Concerns raised and acknowledged within two working days	All recorded, 100%

14 LOOKING AHEAD

Our priorities for 2026–27

- 1** Confirm that every pilot agreement and our standard purchase terms include a modern slavery clause.
- 2** Send a short modern slavery questionnaire to our drone, battery, sensor and PPE suppliers.
- 3** Deliver a modern slavery toolbox talk to all staff and network pilots.
- 4** Build these supplier and subcontractor checks into our ISO 9001 quality management system.

15 REVIEW AND COMMUNICATION

Keeping this policy up to date

The directors approve this policy and review it at least once a year. We will review it sooner if the law changes, if we take on a new type of work or supplier, or if a concern shows a gap in how we work.

We share this policy with every employee and pilot at induction, with suppliers alongside our terms, and with clients in our compliance pack. It is also published on our website.

CONTACT AND APPROVAL

Questions about this policy

Drone Site Surveys Ltd

4A Hurricane Drive
Speke, Liverpool L24 8RL

0345 017 5592

info@dronesitesurveys.co.uk

dronesitesurveys.co.uk

Registered in England & Wales, company no. 12318909.

Monday to Friday, 08:00 to 18:00.

Signed on behalf of the Board

Name **Anthony Carter**

Position **Director**

Date **22 October 2026**