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Modern Slavery and Human Trafficking Statement For the financial year 1st Feb 2026 to 31st Jan 2027

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps ActionDry Emergency Services ("ActionDry", "we", "us", "our") has taken during the financial year to prevent modern slavery and human trafficking in our business and supply chains.

ActionDry has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any part of our supply chains.

At a glance (2024/25)

- Board-approved statement and director sign-off
- Risk assessment completed across key supplier categories
- Supplier onboarding includes modern slavery due diligence and contractual controls
- Staff awareness briefings delivered for procurement and operations roles
- Incident reporting and escalation route in place

1. Our business, organisation and supply chains

ActionDry Emergency Services provides rapid response drying, leak response and property restoration services. We support domestic, commercial and insurer-led claims, supplying equipment and skilled labour to safely stabilise and restore affected sites.

Our principal areas of spend and supply chain activity typically include:

- Specialist subcontract labour (e.g., technicians, trades and temporary labour for peaks in demand)
- Equipment manufacture and hire (dehumidifiers, air movers, heaters, moisture meters, extraction and drying systems)
- Consumables and chemicals (PPE, cleaning agents, antimicrobial treatments, building materials and waste handling)
- Logistics and transport (couriers, fuel, vehicle maintenance, storage and warehousing)
- Professional services (IT, call handling, marketing, facilities, and external consultancy).

We primarily operate in the United Kingdom. However, some goods we use (including equipment components, PPE and consumables) may be manufactured or assembled outside the UK through multi-tier supply chains.

2. Policies and governance

Our framework for preventing modern slavery is supported by policies and procedures, including:

- Modern Slavery and Human Trafficking Policy (zero tolerance and responsibilities)
- Supplier Code of Conduct (labour standards, ethical sourcing and legal compliance expectations)
- Whistleblowing / Speak-Up procedure (confidential reporting and protection from retaliation)
- Recruitment and Right to Work checks (to reduce risks of exploitation in employment practices)
- Safeguarding, Health & Safety and site conduct procedures (including third-party conduct on customer sites).

Ultimate responsibility for preventing modern slavery sits with our senior leadership team. Day-to-day accountability is held by our Operations and Procurement leads, who oversee supplier onboarding, contract controls and incident escalation.

3. Identifying where the risks are highest

Modern slavery risk can arise in any sector. In our context, the higher-risk areas are those involving complex labour supply, temporary or subcontracted work, and products sourced through multi-tier global manufacturing.

Based on our assessment, the areas where modern slavery risks are most likely to be higher include:

- Use of subcontract labour and temporary labour providers (risk of withheld wages, debt bondage, or illegal deductions where labour is supplied through intermediaries).
- PPE, uniforms and some consumables (often produced through complex global supply chains and, in some regions, linked to forced labour concerns).

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- Manufacture of electrical equipment and components (multi-tier supply chains with exposure to high-risk raw materials and overseas manufacturing).
 - Cleaning and facilities services and low-paid services (risk of exploitation in outsourced labour markets).
 - Waste handling and recycling streams (risk where informal labour is used, particularly outside the UK).

We use a proportionate, risk-based approach, considering factors such as country of origin, sector risk, reliance on labour agencies or intermediaries, spend, and the nature of on-site working arrangements.

4. Due diligence and supplier management

We integrate modern slavery due diligence into supplier selection, onboarding and ongoing management. Our approach includes:

- Risk screening at onboarding (supplier type, service geography, and category risk).
- Supplier self-assessment where appropriate (policies, recruitment practices, pay arrangements, right-to-work, and grievance mechanisms).
- Contractual controls, including compliance with applicable laws and our Supplier Code of Conduct.
- Right-to-audit / information rights (proportionate to supplier risk and contract value).
- Use of reputable labour providers, with preference for those demonstrating strong controls and accreditation.
- Escalation and remediation expectations where concerns are identified (including corrective action plans and, where necessary, disengagement).

For labour suppliers and subcontractors, we look for evidence of fair recruitment practices (no recruitment fees charged to workers), transparent pay and deductions, lawful working hours, and accessible grievance channels. We also require compliance with UK legal requirements including right-to-work checks and, where applicable, the Agency Workers Regulations and National Minimum Wage obligations.

Where ActionDry works on customer sites alongside other contractors, we expect safe, respectful working conditions and will raise any labour welfare concerns with the relevant principal contractor or client as appropriate.

5. Training and awareness

We recognise that trained and alert staff are key to identifying and responding to risks. During the year we delivered awareness briefings for relevant roles (including operations management and procurement) covering:

- what modern slavery is and how it can present in UK service sectors and global supply chains
- red flags in labour provision and subcontracting (e.g., workers unable to leave, signs of fear or coercion, unclear pay arrangements)
- how to raise concerns internally and the external support routes available

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- our expectations for supplier behaviour and documentation during onboarding.

We will continue to strengthen training by embedding refresher content into onboarding for new starters in relevant roles and by adding targeted training for those managing labour suppliers.

6. Measuring effectiveness

We monitor the effectiveness of our modern slavery controls through practical indicators. Our current and planned key performance indicators include:

- percentage of in-scope suppliers onboarded with modern slavery due diligence completed
- percentage of higher-risk suppliers with updated self-assessments / evidence reviews
- number of staff in relevant roles completing awareness training
- number of concerns raised and time to initial review and closure
- contract coverage: percentage of supplier contracts including modern slavery / ethical sourcing clauses.

We review findings and trends at leadership level and incorporate learning into supplier management and operational practices.

7. Reporting concerns and remediation

Anyone working for or with ActionDry is encouraged to raise concerns about suspected modern slavery, whether relating to our own workforce, subcontractors, or any tier of our supply chain. Reports can be made to a line manager, the Operations Lead, or via our whistleblowing route.

All reports are assessed promptly and handled sensitively. Where concerns are substantiated, we will work with the supplier (and where appropriate, relevant authorities and expert organisations) to ensure affected individuals are safeguarded and that corrective actions are implemented. If a supplier fails to address issues adequately, we will consider suspension or termination of the relationship.

8. Continuous improvement priorities for 2025/26

In the coming year we will prioritise:

- refreshing and formalising our supplier risk matrix and review cycle
- rolling out a standard Supplier Code of Conduct acknowledgement for in-scope suppliers
- expanding modern slavery clauses in supplier contracts and purchase terms where not already present
- deepening checks for labour suppliers and key subcontractors (including spot checks on right-to-work evidence and pay transparency where lawful and appropriate)
- maintaining and improving staff awareness training and recording completion.

9. Approval, signature and publication

This statement has been approved by the board of directors (or equivalent management body) of ActionDry Emergency Services and is signed by a director (or equivalent) on behalf of the business.

Signed:  A Habbershaw
Position: Director
Date: 1st Feb 2026

It is published in a prominent place at our offices and, where required, submitted to the relevant central reporting platform / registry.

For questions about this statement or our approach to modern slavery, please contact:

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