



P O L I C Y   0 1   O F   1 6

# Modern Slavery Statement

*Real partnership. Real expertise.*

<b>Document reference</b>	SOMA-POL-01
<b>Version</b>	2.0
<b>Issue date</b>	March 2026
<b>Next review</b>	March 2027
<b>Policy owner</b>	Adam O'Neill, Director
<b>Approved by</b>	Stevie MacGregor
<b>Classification</b>	Public — available on request

**SOMA Project Controls Ltd**[www.somaprojectcontrols.com](http://www.somaprojectcontrols.com)

## 1. Purpose

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This statement sets out the steps SOMA Project Controls Ltd takes to understand and mitigate the risk of modern slavery and human trafficking in our business and supply chain, in line with the principles of the UK Modern Slavery Act 2015. Although SOMA currently falls below the Act's statutory turnover threshold, we choose to publish this statement because client confidence, good conscience and good practice all require it.

## 2. Scope

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This statement applies to all directors, employees, associates, contractors and suppliers acting on behalf of SOMA — whether engaged on a permanent, fixed-term or project basis — and to the financial year ending 31 March 2026.

## 3. Our Business

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SOMA is a people-first Project Controls consultancy specialising in schedule, cost and risk management. We work primarily with UK-based infrastructure, construction and engineering clients. Our supply chain is small and deliberately so — the majority of our spend is on professional associates, specialist software, professional-services subscriptions, IT equipment and office services.

## 4. Our Commitment

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We have a zero-tolerance approach to modern slavery in all its forms, including forced or compulsory labour, human trafficking, servitude and child labour. We expect the same commitment from every organisation we work with.

## 5. Risk Assessment

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We assess our modern slavery risk as low, reflecting our sector, geography and the professional nature of our supply chain. We nonetheless recognise that risk is never zero and that the consultancy supply chain touches construction and facilities services where risk is materially higher. We therefore apply proportionate, not token, controls.

## 6. Due Diligence

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- We verify the right to work of every employee and associate before engagement.
- We engage associates only through contracts that expressly prohibit forced or compulsory labour and that require the same of any sub-contracted labour.

- We screen new suppliers for modern slavery indicators proportionate to the goods or services being purchased, with additional scrutiny for any supplier operating in higher-risk categories.
- We flow down our expectations through our Subcontractor & Supply Chain Policy.

## 7. Training & Awareness

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All SOMA personnel are briefed on the indicators of modern slavery and on how to raise a concern. Those with procurement or line-management responsibilities receive additional guidance. The subject is revisited at least annually.

## 8. Raising a Concern

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Anyone who suspects modern slavery in our business or supply chain — including workers of our suppliers — is encouraged to raise it under our Whistleblowing Policy. Concerns can be raised anonymously and will be investigated without fear of reprisal.

## 9. Measuring Effectiveness

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For the reporting period, we track the following indicators:

- Reported incidents of modern slavery in our operations or supply chain — target: zero.
- New suppliers acknowledging our supply-chain expectations before first engagement — target: 100%.
- Employees completing modern-slavery awareness briefings — target: 100%.

## 10. Review & Governance

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This policy is reviewed at least annually, and sooner if legislation, SOMA Project Controls Ltd's operating context or client requirements change materially. The Director is the accountable owner. Minor amendments are logged in the version-control table; material changes trigger a re-issue and fresh sign-off by the policy owner and approver named on the sign-off page.

**S I G N E D & A P P R O V E D**

# Policy Adoption & Approval

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*This policy is formally adopted by SOMA Project Controls Ltd. It is communicated to all employees, associates and, where relevant, supply-chain partners, and is available on request to clients, prospective clients and other interested parties. The signatures below record its adoption and the date from which it takes effect.*

**P O L I C Y O W N E R**

*Adam O'Neill*

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**Adam O'Neill**

Director

SOMA Project Controls Ltd

**Date: March 2026**

**A P P R O V E D B Y**

*Stevie MacGregor*

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**Stevie MacGregor**

Director

SOMA Project Controls Ltd

**Date: March 2026**

N e x t s c h e d u l e d r e v i e w

**March 2027**



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