



Anti-Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the company's slavery and human trafficking statement for the current financial year.

Introduction

We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. All employees are expected to be aware of and to follow the guidance outlined in the company's Anti-Slavery and Human Trafficking Policy and to report concerns.

Managers of the company are required to act whenever any concerns are raised whether from within or from outside of the business.

Organisation's Structure

We are a construction company based solely in the UK. The company has its head office in Magherafelt, Northern Ireland and a regional office in Scotland and England with suppliers and subcontractors based across the UK.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that modern slavery or human trafficking plays no part in our supply chain or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to, as far as practical, ensure slavery and human trafficking is not taking place anywhere in the company or our supply chain.

Our Supply Chain

Our supply chain comprises the engagement of subcontractor organisations to carry out works and services on our construction sites and the sourcing of materials and manufactured products. We are committed to ensuring that slavery and human trafficking plays no part in our supply chain or any part of our business.

As part of our initiative to identify and mitigate risk:

- Where possible we build long-standing relationships with our suppliers and subcontractors and make clear our expectations of business behaviour
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Due Diligence Processes

The Company operates due diligence processes designed to identify, prevent and mitigate the risk of modern slavery and human trafficking within its business and supply chains. These processes are proportionate to the size and nature of the Company and its operations.

Our approach includes:

- Assessing modern slavery risks, where appropriate, when engaging new suppliers and subcontractors
- Making our expectations regarding ethical labour standards clear to suppliers and subcontractors from the outset
- Encouraging openness and transparency throughout the supply chain
- Maintaining reporting mechanisms for employees and third parties to raise concerns confidentially.

Where concerns are identified, the Company will investigate appropriately and take action to address any issues identified, including working with suppliers and subcontractors to improve standards or, where necessary, terminating relationships.

Risk Assessment and Management

The Company recognises that the risk of slavery and human trafficking may arise in certain areas of the construction sector, particularly where subcontract labour, agency workers, or extended material supply chains are used.

We assess and manage these risks by:

- Considering the nature of the work and labour arrangements used on our sites
- Working with reputable and established suppliers and subcontractors wherever possible
- Remaining vigilant for indicators of modern slavery, including unusual working practices or lack of employee autonomy
- Encouraging managers and site teams to report concerns promptly
- We keep this constantly under review, and appropriate steps are taken to manage and reduce risks where they are identified.

Supplier Adherence to our Values

We have zero tolerance to slavery and human trafficking and we expect all those in our supply chain and contractors to comply with our values.

Measuring Effectiveness

The effectiveness of the Company's approach to preventing modern slavery and human trafficking is monitored through:

- The number and nature of concerns raised and investigated
- Ongoing review of supplier and subcontractor relationships
- Feedback from employees and managers
- Review of training and awareness levels.

The Company is committed to continuous improvement and will review and update its practices as necessary to strengthen its approach to managing modern slavery risks.

Training and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, the Company provides training and guidance to relevant employees.

This includes:

- Briefing Directors and senior management on their responsibilities
- Providing guidance to relevant staff, including those involved in procurement, site management and supply chain engagement
- Reinforcing the importance of recognising indicators of modern slavery and reporting concerns.

Training and awareness activities are kept under review to ensure they remain appropriate and effective.



David Henry | Chief Executive Officer
January 2026