



Human Trafficking and Slavery Statement

1. Introduction

The Modern Slavery Act 2015

- 1.1. HBC Construction Limited (HBC) welcomes the introduction of the Modern Slavery Act 2015 (the Act). The aim of the act is in line with our own purpose and values, which include “put people first” and “do the right thing”, both of which are relevant to our approach as set out in this document. For this reason, we applaud any measures that seek to bring about greater transparency and scrutiny into our various supply chains, in order to combat slavery and trafficking activities. In accordance with the legislation, this statement takes into account our measures throughout our supply chain management, with the aim of reducing the risk of slavery and trafficking activities being present within our business operations. It also sets out additional activities carried out in subsequent years following the introduction of our modern slavery approach, to add greater rigour and scrutiny to those measures.
- 1.2. We work with our partners, contractors and suppliers to bring any necessary changes into effect, and then to review their effectiveness and consider any changes or additional measures which such a review highlights. We are committed to improving our practices through these activities, and through improvements identified in future years, to combat slavery and human trafficking.

2. Our supply chains

- 2.1. Our supply chains include:
 - Consultants and advisers
 - Contractors and sub-contractors
 - Suppliers of goods, supplies and materials for all stages of the construction cycle
 - Suppliers of plant and machinery.
- 2.2. We have identified the following areas of the supply chain as comprising the highest risk of slavery and trafficking activities:
 - Human trafficking: In circumstances when using sub-contracted labour forces, where coerced/trafficked gangs may be present
 - Slavery and human trafficking: In circumstances when using materials such as ‘conflict minerals’ (tantalum, tin, gold or tungsten), steel, or other raw materials being predominantly sourced from countries with poor records on slavery and human trafficking.

3. Our policies on slavery and human trafficking

- 3.1. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our anti-slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The practical measures we have taken and will be taking throughout our operations are reflected throughout this statement and our anti-slavery policy and will be built on and developed throughout the coming years to incorporate best practice into our operations.

4. Due diligence processes and supplier adherence

4.1. We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place a supply chain compliance programme.

4.2. As part of our initiative to identify and mitigate risk we have put the following measures into place:

- Contacted existing suppliers and sub-contractors to ask them to confirm their adherence to our anti-slavery policy.
- Ensuring that new suppliers and sub-contractors undertake to comply with our anti-slavery policy through use of due diligence questionnaires and relevant contractual provisions, with appropriate termination provisions for failure to comply.
- Ensuring that the high-risk areas as identified under paragraph 3.2 are kept under regular review to determine whether additional and/or targeted measures are required within our supply chain to combat the risk of slavery and trafficking.
- Ensuring that our whistleblowing procedure is drafted sufficiently widely to encourage whistleblowing in relation to any identified breaches of our anti-slavery policy.
- Inclusion of anti-slavery requirements within our sustainable procurement charter.
- Inclusion of modern slavery and human trafficking risk on all company risk registers for monitoring going forwards, to be reviewed every six months in accordance with business practice.
- Provided modern slavery awareness training to all employees.
- Produced a briefing pack and site information pack with posters to publicise the issue of modern slavery and how to report it.
- Produced modern slavery briefing documents, toolbox talks and posters which provide information on identifying and reporting modern slavery, for distribution throughout the business and to relevant sub-contractors and suppliers.
- Inclusion of modern slavery questions and awareness as part of our supply chain 'on-boarding' process.
- Production of a modern slavery supply chain map.
- Ensuring that supplier audits are capable of being carried out in the event of the report of a potential issue relating to human trafficking or slavery.
- Introduction of mandatory business-wide e-learning on the topic of modern slavery.
- Participation in the Construction Works and Associated Services Modern Slavery Assessment Tool (MSAT) and implementing any areas for improvement.

4.3. These measures are required in order to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains, and
- Protect whistle blowers.

5. Compliance

5.1. The personnel responsible for compliance with this statement and the anti-slavery policy, and for updating and improving our procedures in forthcoming years, shall consist of involvement from the following departments:

- Legal
- Human resources
- Procurement, and
- Management services.

6. Training

6.1. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have implemented mandatory modern slavery training for all of our staff, highlighting the requirements of the act and our anti-slavery policy, and its practical application within our businesses. In 2021, we rolled out mandatory e-learning for all employees. This includes modern slavery as a whole but also a short form of e-learning specific to the operations within our business.

7. Measuring effectiveness

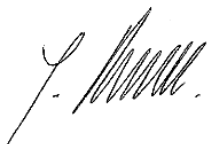
7.1. We used the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- 100% of existing sub-contractors and suppliers on our approved list to commit to our updated due diligence questionnaire confirming their compliance with our anti-slavery policy.
- 100% of new sub-contractors and core suppliers to confirm via our due diligence questionnaire that they will comply with our anti-slavery policy.
- 100% of new supplier and sub-contractor contracts to contain provisions requiring compliance with our anti-slavery policy.

8. Ongoing review

8.1. This statement and our anti-slavery policy will be subject to regular and ongoing reviews (at least annually) to ensure their effectiveness, and to update the requirements where further measures are identified.

Approved by:



Lee Powell
Managing Director
05 January 2026