

## SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

Mildren Construction Limited is committed to conducting its business ethically and with integrity and to preventing modern slavery and human trafficking in all aspects of its operations and supply chain.

The Company recognises its responsibilities under the Modern Slavery Act 2015 and is committed to implementing and enforcing effective systems and controls to ensure that modern slavery, servitude, forced labour, compulsory labour and human trafficking are not taking place within our business or supply chains.

This statement outlines the steps taken by Mildren Construction Limited to understand potential modern slavery risks within our business and supply chain and the measures adopted to minimise those risks.

### Our Organisation

Mildren Construction Limited is a construction contractor operating within the construction sector, delivering projects across a range of market sectors. Our activities include project management, construction delivery and the procurement of specialist subcontractors, suppliers, plant, materials and professional services to support our operations.

The Company employs a directly engaged workforce and works closely with a network of subcontractors, suppliers and service providers throughout the United Kingdom.

- Our Supply Chains
- Our supply chain includes:
  - Building material suppliers and manufacturers.
  - Plant and equipment suppliers.
  - Labour providers and recruitment agencies.
  - Specialist subcontractors.
  - Professional consultants and service providers.
  - Logistics and transportation providers.

We recognise that risks associated with modern slavery can exist within the construction industry, particularly where labour-intensive activities, temporary labour, agency workers and complex supply chains are involved. We therefore seek to work only with organisations that share our commitment to ethical business practices.

### Our Policies in Relation to Modern Slavery and Human Trafficking

Mildren Construction Limited operates a number of policies and procedures that support our commitment to preventing modern slavery and human trafficking, including:

- Health, Safety and Wellbeing Policies (P-001)
- Slavery and Human Trafficking Policy Statement (P-005)
- Anti-Bribery and Corruption Policy and Statement (P-006)
- Right to Work Statement (P-007)
- Equal Opportunities Policy & Statement (P-009)
- Whistleblowing Policy (P-013)
- Counterfeit, Fraudulent and Suspect Items (CFSI) Statement (P-016)
- Industrial Relations Policy (P-023)
- Supplier and Subcontractor Procurement Procedures (PROC-001, PROC-002)

These policies promote ethical behaviour, fair treatment of workers and compliance with applicable employment legislation.

### **Due Diligence Processes**

To identify and mitigate the risk of modern slavery within our operations and supply chain, Mildren Construction Limited undertakes due diligence activities that may include:

- Assessing suppliers and subcontractors during pre-qualification and procurement stages.
- Requiring suppliers and subcontractors to comply with relevant employment laws and ethical working standards.
- Reviewing supplier competency information and accreditations.
- Monitoring supplier and subcontractor performance throughout project delivery.

Where concerns are identified, the Company reserves the right to request further information, undertake additional reviews or terminate business relationships where appropriate.

### **Risk Assessment and Management**

The Company periodically reviews areas of its operations and supply chain where risks of modern slavery may arise. Particular consideration is given to:

- Labour-only subcontracting arrangements.
- Agency and temporary labour providers.
- High-risk sectors or regions identified through industry guidance.

Findings from these reviews are considered by management and incorporated into procurement and supplier management processes where necessary.

To assess the effectiveness of our actions in preventing modern slavery and human trafficking, Mildren Construction Limited monitors a range of indicators, including:

- Number of reported concerns or incidents relating to modern slavery.
- Investigation and resolution of any reported concerns.
- Review of supplier compliance and performance.
- Completion rates for staff awareness and training programmes.
- Annual management review of the Company's modern slavery arrangements.

### **Training and Awareness**

The Company will provide appropriate information, instruction and training to employees proportionate to their responsibilities. Training may include:

- Understanding the requirements of the Modern Slavery Act 2015.
- Recognising indicators of modern slavery and human trafficking.
- Understanding reporting and escalation procedures.
- Identifying risks within recruitment, procurement and supply chain activities.

Employees are encouraged to report any concerns and can do so through their line manager, senior management or via the Company's whistleblowing arrangements without fear of retaliation.

### **Continuous Improvement**

Mildren Construction Limited is committed to continuously improving its approach to preventing modern slavery and human trafficking. We will regularly review our policies, procedures, risk assessments and training arrangements to ensure they remain effective and reflect current legislation and industry best practice.

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This statement has been approved by the Board of Directors of Mildren Construction Limited and will be reviewed annually.



Signed: Simon French  
Position: Managing Director  
Date: July 2026