

Modern Slavery Annual Statement



October 2025

Britcon's Structure and Business

Britcon provides building, civil engineering and steelwork solutions for the built environment, operating primarily within the commercial, industrial, transport, education, retail, waste and infrastructure sectors. Established in 1990 as a family business with exceptional credentials, Britcon is a trusted partner delivering safe, innovative and value driven solutions. Our work takes place within the UK with operating bases at Scunthorpe, North Lincolnshire and Wakefield, West Yorkshire.

Britcon is proud of the ethical standards that it has embedded into its business over many years and believes that these standards are consistent with the underlying principles of the Modern Slavery Act 2015. Slavery and the trafficking of people have no place in the modern world.

We directly employ around 95 individuals throughout the UK based across our two offices and various construction projects, together with a Scunthorpe-based steel engineering workshop.

Britcon's Supply Chain

Britcon's supply chain consists mainly of UK-based:

- Subcontractors employed to deliver works packages as part of Britcon construction projects
- Suppliers of plant, equipment and materials
- Labour agencies providing operatives to work under Britcon supervision on Britcon construction projects

Britcon's Policies in Relation to Modern Slavery

Britcon is committed to ensuring, in so far as possible, that there is no modern slavery or human trafficking in our supply chains or in any part of our business and we take a zero-tolerance approach to slavery and human trafficking.

Britcon operates a modern, robust integrated management system designed to manage all manner of risk across all business operations. This integrated system includes:

- Management systems certified to the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018
- This Annual Modern Slavery Statement
- Policy on Modern Slavery and Human Trafficking
- Corporate Social Responsibility Policy
- Ethical Trading and Sustainable Procurement Policies
- Anti-Bribery & Corruption Policy
- HSS 14 Subcontractor Management Standard, which includes processes for including relevant checks during approvals for companies and inductions for individuals
- Britcon Code of Conduct for Subcontractors
- Whistleblowing Policy

The above policies are available to all staff via our intranet and to external parties on request.

In adhering to these policies, Britcon will:

- Include, as part of our contracting processes, obligations to ensure compliance with the requirements of the Modern Slavery Act 2015.
- Encourage openness and provide support to anyone who raises genuine concerns in good faith in relation to this policy, even if they turn out to be mistaken. Britcon are committed to ensuring that no one suffers any unfair treatment as a result of reporting suspicions that modern slavery in whatever form is, or may be, taking place in any part of our own business or in the businesses of any of our supply chains.
- Communicate our zero-tolerance approach to modern slavery with our supply chain and business partners at the outset of our business relationship with them.

Britcon Due Diligence in Assessing and Managing the Risk of Modern Slavery in its Business and Supply Chain

We have reviewed our exposure to the risk of Modern Slavery across all aspects of our business, and consider our key risk areas to be:

- Employment practices of labour agencies providing temporary and agency workers
- Subcontractor relationships, where we consider employment and payment practices
- Suppliers, where we assess risk based on geography, material or component type and our relationship with the supplier

All of our direct employees are paid in accordance with UK legislation and this is kept under regular review. Our employment process include all relevant checks, such as right to work in the UK.

We expect all agency providers to be able to satisfy us that staff all have written employment contracts, have not had to pay for the opportunity to work, and are legally able to work within the UK. Within the tender process we will be taking consideration of the agency's ability to respond to our requests for compliance.

Our subcontractor approval process includes a check on companies' own modern slavery policies, which is included as part of our annual subcontractor review process. All subcontractors working for Britcon must sign up to the Britcon Code of Conduct for Subcontractors, which includes our stance on Modern Slavery and whistleblowing guidance.

Britcon aims to build long-lasting relationships with known subcontractors and suppliers, but will ensure appropriate checks are undertaken on any new partners to cover the associated level of risk. Britcon aims to use local subcontractors and suppliers wherever possible, and expects suppliers to be able to demonstrate transparency and traceability in relation to the upstream supply chain. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Britcon's Actions, Targets and Performance Indicators in Prevention of Modern Slavery

- 0 instances of modern slavery issues within our business or supply chain
- 100% of reported issues to be fully investigated and any individuals reporting issues to be treated fairly and suffer no negative repercussions
- 100% of Britcon new starters to be issued with, and briefed on, the company's Modern Slavery Policy
- 100% of Britcon employees to be issued with an annual refresher on Modern Slavery
- 100% adherence to our ethical trading and sustainable procurement policies across all of our projects
- 100% of new subcontractors and suppliers to be subject to our onboarding checks prior to any orders being placed
- 100% of subcontractors to be subject to our annual review process

No modern slavery issues were identified or reported within our business or supply chain during the financial year October 2024 – September 2025.

Training and Building Capacity Amongst Staff

Britcon has policies in place aimed at providing information and guidance to all persons working for Britcon in any capacity on how the company deals with modern slavery and the role that all individuals involved with our business must play in ensuring compliance with the Act.

All new employees at Britcon are provided with copies of our key policies, including our Modern Slavery Policy, and all staff are issued with an annual refresher covering:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within Britcon

Key roles are required to complete regular refresher training around modern slavery including practices to implement and spotting the signs.

Board Approval

With these procedures in place, we are satisfied that Britcon is taking appropriate steps to ensure that slavery and human trafficking is not taking place in any parts of our business or supply chain. Britcon will monitor the effectiveness of the steps we are taking on an on-going basis and will report on any relevant additional steps in our next annual statement under the Modern Slavery and Human Trafficking Act.

This statement has been approved and signed by our Company's Board who will review, update and publish this statement annually:

Signed on behalf of the board of directors:

A handwritten signature in black ink, appearing to read 'Nick Shepherd', with a long horizontal line extending to the right.

Nick Shepherd, Managing Director