

MODERN SLAVERY ANNUAL STATEMENT

Annual Modern Slavery Statement published October 2026, pursuant to section 54 of the Modern Slavery Act 2015.

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 105 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 contracts only with UK-based subcontractors and suppliers. However, we recognise that some materials, products and components may have extended or international upstream supply chains over which Britcon has less direct visibility. This is considered when determining the level of due diligence that is proportionate to the supplier, product and associated risk.

Britcon's Policies in Relation to Modern Slavery

Britcon is committed to ensuring, insofar 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
- 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.

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- 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 is 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 part 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

These risk areas were identified through consideration of Britcon's workforce model, use of temporary and subcontracted labour, subcontractor and supplier approval arrangements, the nature and origin of materials and services purchased, and the degree of visibility and control available within each relationship.

Britcon's procedures require all directly employed workers to receive written terms of employment, to be paid at or above applicable statutory minimums and to undergo the required right-to-work checks before commencing employment. Compliance with these requirements is kept under review.

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. During the reporting year, our tender and appointment processes considered labour agencies' ability to demonstrate compliance with our modern slavery and ethical employment requirements.

Our subcontractor approval process includes a review of companies' modern slavery arrangements and wider compliance controls. Britcon utilises the Compliance Chain prequalification system, through which subcontractors are assessed against recognised industry standards and compliance requirements, including CAS andSSIP accreditation where applicable. This forms part of our due diligence process when appointing and reviewing subcontractors. 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.

Where a potential modern slavery concern is identified, Britcon will take appropriate steps to protect any person who may be at risk, investigate or escalate the concern through suitable internal and external channels, and consider appropriate remediation. Britcon will work with relevant suppliers, authorities and specialist organisations where appropriate. Any decision to suspend or terminate a commercial relationship will take account of the potential impact on affected workers and will not replace the need to protect individuals or support appropriate remediation.

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

During the financial year from October 2025 to September 2026, Britcon continued to implement its modern slavery controls through employee awareness and training, right-to-work checks,

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subcontractor and supplier approval processes, annual subcontractor reviews and the communication of our expectations to supply-chain partners.

Britcon monitors the implementation and effectiveness of these arrangements through the following performance indicators:

- All reported or identified modern slavery concerns are to be promptly assessed, appropriately investigated and addressed, with suitable steps taken to protect any person who may be at risk.
- Individuals who raise concerns in good faith are to be treated fairly and protected from detrimental treatment.
- All new Britcon employees are to be issued with, and made aware of, the company's Modern Slavery Policy as part of their induction.
- Britcon employees are to receive periodic modern slavery awareness information or refresher training appropriate to their role and level of exposure.
- All new subcontractors are to be subject to onboarding and prequalification checks, including assessment through Britcon's approved compliance management processes, before work commences or orders are placed.
- All subcontractors are to be included within Britcon's annual review process.
- Britcon projects are expected to operate in accordance with the company's ethical trading and sustainable procurement requirements.

No modern slavery concerns, indicators or suspected incidents were identified or reported within Britcon's business or supply chain during the financial year from October 2025 to September 2026. Britcon recognises that the absence of reported concerns does not, in itself, demonstrate that modern slavery risks have been eliminated. We will therefore continue to maintain awareness, apply proportionate due diligence and encourage the reporting of any concerns.

During the next reporting year, Britcon will strengthen the recording and monitoring of its modern slavery controls so that future statements can report more clearly on:

- Employee induction and awareness completion rates.
- The number and proportion of new subcontractors successfully completing Compliance Chain and onboarding requirements prior to appointment.
- Completion of the annual subcontractor review process.
- Modern slavery concerns raised, investigated and resolved.
- Any enhanced due diligence or corrective action undertaken in response to identified risks.

Responsibility for monitoring these measures will sit with the relevant operational functions, supported by Britcon's compliance arrangements, with significant concerns or findings escalated to senior management and the Board as appropriate.

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

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Awareness training is provided periodically to employees whose roles involve recruitment, procurement, subcontractor management, site supervision or supplier engagement. This covers the potential indicators of modern slavery, escalation and reporting arrangements, relevant due diligence controls and the appropriate response to suspected cases.

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 Act 2015.

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:



Nick Shepherd, Managing Director