

Modern Slavery and Human Trafficking Statement

This statement sets out our processes and procedures in relation to Modern Slavery ACT 2015 which have been taken to date and will remain in place for the financial year ending 30th June 2026 - BECT Building Contractors Limited.

1. Introduction

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by BECT Building Contractors Limited to prevent modern slavery and human trafficking within our business operations and supply chains during the financial year ending 2026

BECT is committed to conducting all its business ethically, transparently, and in compliance with applicable laws and regulations. We take a zero-tolerance approach to modern slavery and human trafficking and are dedicated to ensuring that such practices have no place within our business or supply chains.

2. Our Organisation and Structure

BECT Building Contractors Limited is a privately owned construction company operating throughout England and Wales. With an annual turnover of approximately £58 million, we provide a range of construction, refurbishment, and project management services across commercial, residential, private and public sectors.

The Company operates from its head office in Cardiff and engages a network of subcontractors, suppliers, and consultants to deliver high-quality construction solutions.

3. Our Policies and Commitments

We are guided by a robust set of internal policies that support ethical business practices and help us identify and mitigate risks associated with modern slavery. These include:

- **Modern Slavery Policy** – sets out the company structure and rules for identifying and avoiding Modern Slavery and Human Trafficking.
- **Whistleblowing Policy** – encourages staff and stakeholders to report any concerns or suspicions of unethical behaviour, including modern slavery, without fear of reprisal.
- **Procurement and Sustainable Policy** – ensures that suppliers and subcontractors meet our ethical and sustainability standards.
- **Training Policy** – provides staff and subcontractors with awareness and education on ethical conduct, compliance, and identifying risks of modern slavery.
- **Quality Management Policy** – promotes accountability, continuous improvement, and adherence to regulatory and ethical requirements in all areas of operation.

4. Supply Chain and Risk Management

Our supply chain primarily consists of subcontractors, material suppliers, and professional service providers based within the UK. While the risk of modern slavery within our direct operations is considered extremely low, we acknowledge that risks can exist deeper within the supply chain, particularly where materials are sourced internationally.

We manage this risk through:

- Supplier vetting and prequalification processes that assess ethical and labour standards.
- Inclusion of anti-slavery and human trafficking clauses in contracts where appropriate.
- Encouraging transparency and cooperation from our supply chain partners; and regularly audit to ensure upkeep of compliance.
- Ongoing review of supplier performance and adherence to our procurement policies.

5. Due Diligence and Compliance

BECT undertake due diligence to identify and address any potential risks of modern slavery or human trafficking, including:

- Assessing new suppliers and subcontractors for compliance with the Modern Slavery Act; we ask for the following proof of competency records:
 - Are all workers legally able to work (e.g., right to work checks)?
 - Supervision of Apprentices/Trainees – Are apprentices or trainees properly supervised?
 - Verification of Qualifications – Are worker qualifications verified and kept up to date?
 - Labour Hire/Subcontracting – Are they using labour hire or subcontracting your scope? If so, are they also compliant?
- Monitoring high-risk areas within the construction materials supply chain.
- Requiring suppliers to confirm compliance with relevant legislation and ethical standards.

6. Training and Awareness

To support the implementation of our policies, BECT provides training to relevant staff and subcontractors to ensure understanding of:

- The principles of the Modern Slavery Act 2015.
- How to identify potential signs of modern slavery.
- How to report concerns safely and effectively through our whistleblowing procedures.

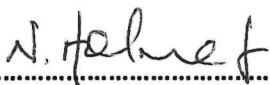
7. Future Actions

In the coming year, BECT intends to:

- Continue improving supplier due diligence and monitoring processes by implementing KPI's
- Expand modern slavery awareness training across the wider workforce, carry out TBT and online training on induction.
- Display Modern Slavery posters on our project notice boards with helpline numbers
- Review and update our procurement policies to reflect best practice; and
- Strengthen collaboration with suppliers and industry partners to promote ethical supply chains.

8. Approval

This statement has been approved by the Board of Directors of BECT Building Contractors Limited and will be reviewed and updated annually.

Signed: .....

Date: 17th October 2025

NATHAN HOLMES
DIRECTOR