Modern Slavery and Human Trafficking Statement

Financial Year Ending 2025

Introduction

Barnwood Ltd is committed to preventing modern slavery and human trafficking in all areas of our business and supply chains. We recognise our responsibility under the Modern Slavery Act 2015 to ensure that slavery, servitude, forced or compulsory labour, and human trafficking are not taking place within our operations or those within our supply chain.

As a construction contractor operating across the UK, we engage with a wide range of suppliers, subcontractors, and labour providers. We take our role in promoting ethical practices seriously, protecting workers' rights, and safeguarding vulnerable individuals.

Our Business

Barnwood Ltd delivers construction activity solely in UK, operating in both public and private sectors. Our supply chain includes subcontracted labour, building materials, plant hire, professional services, and specialist trades.

Although the construction industry is recognised as being at higher risk of human trafficking and exploitation due to the widespread use of agency workers and reliance on migrant labour, we believe several factors significantly reduce the risk of modern slavery within our business and supply chains. These include:

- Directly employed, experienced Site Managers on all Barnwood projects, ensuring strong oversight, visibility, and vigilance to help prevent any instances of slavery or human trafficking from going undetected.
- UK-only operations, which allow for greater regulatory oversight and alignment with UK labour standards.
- A non-seasonal workforce model, meaning we do not depend on transient or temporary skilled labour, further reducing potential vulnerabilities
- We keep the use of agency labour to a minimum. As a group with three divisions, we can share resources and labour across the business where required. In instances where temporary labour is necessary, we engage only with agencies from our preferred supplier list. These agencies are subject to stringent due diligence processes, including quarterly audits to verify right-to-work documentation and ensure compliance with our standards.

Our Governance

Our CEO, Matthew Williams leads our work on modern slavery at Board level, whilst Gemma Cox, Head of HR & Social Value manages the implementation and reporting of our modern slavery work.

Our Policy in relation to Modern Slavery & Human Trafficking

We have a **zero-tolerance approach** to modern slavery and are committed to:

- Acting ethically and with integrity in all business relationships.
- Implementing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.
- Communicating with our supply chain, with particular emphasis on smaller subcontractors on the requirements of the Modern Slavery Act
- Participating in collaborative initiatives by organisations such as 'Unseen and 'Stronger Together'
- Complying with relevant UK legislation, including the Modern Slavery Act 2015.

Due Diligence in Supply Chains

To identify and mitigate risks, we:

- Conduct checks on new suppliers and subcontractors, assessing their compliance with Barnwood Policies, and the Modern Slavery Act 2015.
- Require subcontractors and labour providers to confirm adherence to UK employment law, including right-to-work checks and fair wage practices.
- Incorporate modern slavery clauses into contracts where appropriate.
- Maintain relationships with trusted, long-term suppliers wherever possible.
- Limit the use of subcontractors appointing further subcontractors wherever possible, ensuring greater oversight, accountability, and control

Risk Assessment

Given the nature of the construction industry, we recognise potential risks in:

- The use of temporary, agency, or migrant labour through our supply chain
- Material supply chains that may extend overseas.
- We monitor these risks by reviewing supplier practices and engaging directly with contractors to promote ethical standards.

Right to Work

We have reviewed our processes in light of the expanded UK right to work scheme introduced by the Border Security, Asylum and Immigration Act 2025, which came into force on 1 October 2026. We carry out right to work checks ourselves on every individual we engage directly rather than through a company, including sole traders paid under the Construction Industry Scheme, before they start work. Our subcontract agreements also require subcontractors to carry out prescribed right to work checks on every individual working on our projects, including substitutes and any further subcontractors, and give us the right to audit their compliance.

Training, Awareness & KPIs

We are committed to ensuring that all employees involved in procurement, contract management, and site supervision are equipped to recognise and respond appropriately to potential risks of modern slavery. Training and guidance are provided to both employees and subcontractors to raise awareness of their responsibilities under the Act and to promote best practice across our operations and supply chains.

Our training covers, but is not limited to:

- Recognising the signs of slavery and human trafficking.
- Steps to take if slavery or human trafficking is suspected.
- Escalation procedures for raising concerns both internally and externally.
- Addressing non-compliance, including measures such as removal from our supply chain where suppliers or contractors fail to implement adequate anti-slavery policies in high-risk situations.
- Responsible purchasing practices, with an emphasis on caution where pricing may appear unrealistically low.

We also work in partnership with specialist organisations such as Stronger Together and Supply Chain Sustainability School. By using their training and resources, we ensure our approach remains aligned with current best practice and that this knowledge is communicated throughout our supply chain.

Posters creating awareness, and external support helplines are included in our standard site set up across all areas of the business.

We will continue to monitor KPI's in relation to all our training to ensure our continual improvement and high standards. We are committed to developing and implementing a more comprehensive set of KPI's for our supply chain, and plan to invest in technology to assist us.

Reporting Concerns

We encourage staff, subcontractors, and supply chain partners to report any concerns related to modern slavery through our whistleblowing procedures. Reports will be treated confidentially and investigated thoroughly.

Specific training is given to ensure those that are responsible for Site Supervision know who to contact in the event of any incident involving concerns around modern slavery or human trafficking.

Our Commitment

Barnwood Ltd will continue to strengthen our processes to prevent modern slavery and human trafficking. We will review and update this statement annually to reflect our progress and ensure ongoing compliance.

Policy Control

Ratified by Board of Directors
19th December 2025

Formally signed
22nd October 2026

Last Reviewed dated:
22nd October 2026

Next Review Date:
4th January 2027

Matthew Williams
CEO
Barnwood Limited

Chris Preece
Managing Director
Barnwood Shopfitting & Interiors Division

Gus McKenna
Managing Director
Barnwood General Works Division

Stuart Pearce
Joint Managing Director
Barnwood Construction Division

Will Steel
Joint Managing Director
Barnwood Construction Division