

MODERN SLAVERY POLICY

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

MPH Construction have a zero- tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain set out by the principles of the ILO/UN Guiding Principles and the Modern Slavery act 2015.

Organisation Structure and Supply Chains

MPH Construction is a privately owned construction company based in Mold, Flintshire, North Wales serving its clients throughout Wales, North of England and the Midlands. The principal activity of the company is building construction, civils and maintenance for a wide range of commercial and public clients that include Local Authorities and National Infrastructure organisations.

Our supply chains include:

- Contractors and sub-contractors
- Suppliers of goods, supplies and materials for all stages of the construction cycle,
- Suppliers of plant and machinery.
- Consultants and advisers

MPH Construction employs over 100 employees, which encompasses professional, technical, operational and support staff from its head office in Mold, and its areas of operation.

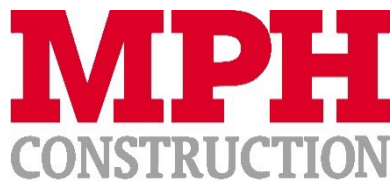
Policies in relation to Slavery and Human Trafficking

We are committed to ensuring there is transparency within our own business, as well as in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners.

As part of our contracting & procurement processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether they are adults or children. We expect that our suppliers will hold their own suppliers to the same high standards.

We operate a number of internal policies and processes to ensure that we are conducting business in an ethical and transparent manner. These include:

- Modern Slavery Policy
- Employment and Equal Opportunities Policy Statement
- Equality Diversity and Inclusion Policy Statement



- Ethical Trading Policy Statement
- Management of Procurement for suppliers and materials processes

These policies are all linked to the way our business is operated through operational controls, workforce onboarding, training and our engagement with customers and suppliers.

Due Diligence Processes

We have zero tolerance to slavery and human trafficking, and we will not work with any organisation which conducts their operations in a manner that causes us concern.

As part of our initiative to identify and mitigate risk we have put the following measures into place: -

- Ensuring that new suppliers and sub-contractors undertake to comply with our anti-slavery policy through use of due diligence questionnaires and relevant contractual provisions, within our supply chain 'on-boarding' process.
- Provided modern slavery awareness training to key employees.
- Ensuring that our whistleblowing procedure is communicated sufficiently widely within the business to encourage whistleblowing in relation to any identified breaches of our anti-slavery policy.
- Contacted existing suppliers and sub-contractors to ask them to confirm their adherence to our anti-slavery policy.

Where non-UK based companies form part of our supply chain, we will seek the same assurances that they comply with the letter and ethos of the Modern Slavery Act.

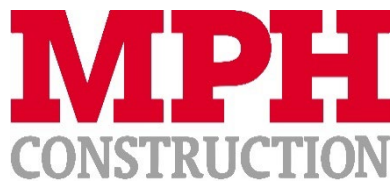
Risk Assessment and Management

We use the Risk Management processes to assess which of our own activities and supply chains activities presents the highest risks in respect of slavery or human trafficking. We have identified the following areas of the supply chain as comprising the highest risk of slavery and trafficking activities:

- Human trafficking: In circumstances when using sub-contracted labour forces, where coerced/trafficked gangs may be present.
- Slavery and human trafficking: in circumstances when using timber, steel, or other raw materials being predominantly sourced from countries with poor records on slavery and human trafficking, which includes 'conflict minerals' (tantalum, tin, gold or tungsten).

It should be noted we procure the majority of our directly sourced materials from UK based organisations that are required to comply with UK laws.

The relationship with all our suppliers has been established over a number of years and is built upon mutually beneficial factors, where we have close and personal links and contact with the owners or directors, typically reflecting the fact that we partner with small and medium sized operations in the main.



As and when we have new contractors or suppliers come on-board, we pre-qualify any new firm through a series of diligence, relating to company performance, HS&E compliance and references from other customers to establish they are suitable.

We subscribe to an independent confidential reporting body (CIRAS), providing a safe channel of communication for staff to raise concerns. All employees are made aware of CIRAS during their company induction, and we continue to raise awareness through internal communications to employees.

We promote our Health & Safety Policy, which has been endorsed by all our directors, demonstrating a clear commitment from the highest levels in MPH Construction to the safety and welfare of our staff and business.

Where MPH Construction becomes aware of potential allegations or risks of Modern Slavery associated with our direct suppliers, we recognise that termination of such relationships is one of a range of responses and may not be the most sustainable or effective response. MPH Construction will review the allegations and risks and, where appropriate work with suppliers to resolve them and take necessary steps. (Including, if necessary, the closure of the business relationship). The Directors of MPH Construction hold the responsibility and are the point of contact for any modern slavery concerns raised in the business or our supply chain.

Key Performance Indicators to measure Effectiveness of Steps being taken

Following our risk assessment and the review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chain, we currently consider there is no such slavery or human trafficking. We will continue in our efforts in this regard. The clearest indicator that the MPH Construction's policies are working will be no reported incidents of modern slavery or human trafficking within the company or our supply chain – be this by internal or external reporting or through law enforcement agencies.

We will continue to consider whether any such significant changes in the international situation change our approach as we acknowledge that modern slavery and human trafficking crosses international borders.

Throughout FY24/25 there were no instances of modern slavery linked to the MPH Ltd highlighted by any of the following parties:

- Stakeholders
- Employees of the business
- Temporary Workers
- Clients

Training on Modern Slavery and Trafficking

We recognise that modern slavery risk continues to evolve, and we will develop our approach in the coming years to ensure that we continue to maintain our level of compliance.

We will provide training to relevant members of staff at Induction to ensure that they understand the risks of modern slavery infiltrating our business or supply chains and effective operation of our policies and procedures that are aimed at mitigating this risk. This is achieved through the Induction process, through company briefings and internal communications.

During the period FY25/26, we will make available further training for staff to raise awareness of the issues around Modern Slavery & Human Trafficking and make this available to all staff.

As part of the Human resources activity, we will conduct regular audits of right to work document and ensure that any matters arising are dealt with immediately and through the appropriate channels.

Approval for this Statement

This statement for the financial year ending September 2025 is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that MPH Construction has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

This policy will be reviewed annually as part of the Management review process, to ensure its continued relevance and adequacy.



Andy Roberts
Director



Andrew Lee Roberts
Director