

ETEC CONTRACT SERVICES LIMITED

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

For the Financial Year Ended 31 March 2026

Modern slavery and human trafficking policy statement

ETEC Contract Services Limited ("ETEC") is committed to conducting its business ethically, responsibly and with integrity. We have a **zero-tolerance approach to modern slavery and human trafficking** and are committed to preventing slavery, servitude, forced or compulsory labour, debt bondage, human trafficking and other forms of worker exploitation within our business and supply chains.

1. Our Policy

ETEC expects all employees, agency workers, subcontractors, suppliers, consultants, labour providers and other persons or organisations working for or on behalf of the Company to uphold high standards of ethical conduct and comply with applicable modern slavery, employment and human rights legislation.

ETEC is committed to:

- maintaining a **zero-tolerance approach** to modern slavery, human trafficking, forced labour and worker exploitation;
- using reputable labour and employment agencies and undertaking appropriate verification before engagement;
- seeking assurance that workers and jobseekers are **not charged recruitment fees** by labour providers;
- communicating appropriate modern slavery and ethical employment expectations to suppliers, subcontractors and other business partners;
- maintaining appropriate oversight of labour providers, suppliers and subcontractors, particularly where a higher potential risk of worker exploitation may exist;
- promoting fair, ethical and responsible recruitment and employment practices;
- providing employees and others with appropriate mechanisms to **raise concerns and report suspected exploitation**, including through line management and the Company's whistleblowing arrangements;
- protecting individuals who raise genuine concerns in good faith from retaliation or detrimental treatment;
- investigating and escalating credible concerns and taking appropriate corrective action where necessary;
- reviewing commercial relationships where serious non-compliance or modern slavery concerns are identified; and
- continually reviewing and improving our arrangements for identifying, preventing and managing modern slavery risks.

Training and Awareness

All ETEC staff are required to undertake the Company's mandatory training programme, with completion monitored through the Company training matrix.

ETEC's wider training and awareness framework supports ethical conduct, employee welfare and the identification and reporting of inappropriate behaviour. Relevant training includes **Whistleblowing, Equality and Diversity, Anti-Bribery, Sexual Harassment Awareness, Data**

Protection, Stress Management, Drug and Alcohol awareness, Lone Working and relevant health and safety training, together with additional role-specific training where appropriate.

ETEC is committed to further strengthening specific **Modern Slavery and Human Trafficking awareness** through relevant induction, management briefing and compliance training arrangements.

Responsibility and Reporting

Overall responsibility for implementing ETEC's approach to modern slavery and human trafficking rests with the Company's **senior leadership**, supported by management throughout the business.

Managers are responsible for supporting implementation within their areas of responsibility, while all employees and those working on ETEC's behalf are expected to remain alert to potential signs of exploitation and report concerns promptly.

Any suspected instance of modern slavery, human trafficking, forced labour or worker exploitation should be reported to line management or through ETEC's established whistleblowing arrangements.

ETEC will take reported concerns seriously and will consider appropriate investigation, corrective action, escalation and, where appropriate, referral to the relevant authorities.

Approved by:

CEO



12/08/2026

Signed: _____

Dated: _____

2. Statement of Commitment

ETEC Contract Services Limited ("ETECC", "the Company", "we", "our" or "us") is committed to conducting its business ethically, responsibly and with integrity.

We recognise that modern slavery is a serious violation of fundamental human rights and can take a number of forms, including slavery, servitude, forced or compulsory labour, debt bondage and human trafficking.

ETEC has a **zero-tolerance approach to modern slavery and human trafficking** and is committed to taking appropriate and proportionate steps to identify, prevent and mitigate the risk of modern slavery and human trafficking occurring within its own operations and supply chains.

This statement is made pursuant to **section 54 of the Modern Slavery Act 2015** and sets out the steps taken by ETEC to identify, assess, manage and mitigate modern slavery and human trafficking risks within its business and supply chains during the financial year ended **31 March 2026**.

This statement should be read alongside ETEC's Modern Slavery Policy and other relevant Company policies and procedures.

3. Our Organisation, Business and Supply Chains

EETEC Contract Services Limited is a private limited company registered in England and Wales and operates principally within the UK construction industry.

EETEC provides principal contracting and construction services across a range of sectors. Our activities involve the planning, management, coordination and delivery of construction projects through a combination of directly employed personnel, subcontractors, specialist contractors, professional service providers and suppliers.

Our supply chain includes, as applicable:

- construction subcontractors and specialist trades;
- labour and employment agencies;
- material and equipment suppliers;
- plant and equipment providers;
- professional consultants;
- technical and professional service providers; and
- other organisations supporting the delivery of our construction projects and corporate activities.

EETEC recognises that construction is a labour-intensive sector and that construction supply chains may involve multiple tiers of subcontracting and the use of temporary and agency labour.

These characteristics can increase exposure to modern slavery, human trafficking and labour exploitation risks where appropriate controls and oversight are not maintained.

We therefore seek to work with reputable organisations and expect our employees, agency workers, subcontractors, suppliers, consultants and other business partners to conduct themselves ethically and comply with applicable employment, labour, human rights and modern slavery legislation.

4. Policies in Relation to Modern Slavery and Human Trafficking

EETEC maintains a **Modern Slavery Policy** which establishes the Company's zero-tolerance approach to modern slavery and human trafficking.

The policy applies to individuals working for EETEC or on the Company's behalf, including employees, directors, officers, agency workers, agents, contractors, consultants and business partners.

EETEC expects its suppliers, subcontractors, contractors and other business partners to maintain appropriate standards of ethical conduct and comply with applicable modern slavery, employment and human rights legislation.

Overall responsibility for EETEC's approach to modern slavery and human trafficking rests with the Company's **senior leadership**, supported by management across the business. Line managers are responsible for supporting implementation of the Company's requirements within their areas of responsibility and ensuring that employees understand and comply with relevant policies and procedures.

All persons working for or on behalf of ETEC are expected to remain alert to potential indicators of exploitation and to report concerns or suspected breaches.

Concerns may be raised with line management or through the Company's established whistleblowing arrangements. ETEC encourages concerns to be raised at the earliest opportunity and seeks to ensure that individuals raising genuine concerns in good faith do not suffer detrimental treatment or victimisation.

Where appropriate, ETEC may take action in response to breaches of its requirements. Depending upon the circumstances, this may include disciplinary action in relation to employees and action concerning commercial relationships with suppliers, contractors or other business partners found to be involved in modern slavery or serious worker exploitation.

5. Due Diligence Processes

ETEC recognises that effective and proportionate due diligence is an important component of preventing modern slavery and human trafficking within its operations and supply chains.

Our existing due diligence arrangements include:

- using specified and reputable employment agencies when sourcing labour;
- verification of new employment agencies before engagement;
- seeking confirmation that relevant employment agencies do not charge recruitment fees to workers or jobseekers;
- communicating expectations regarding compliance with applicable employment, human rights and modern slavery requirements;
- setting appropriate contractual expectations for suppliers, subcontractors, contractors and other business partners;
- maintaining management oversight of relevant supplier and subcontractor relationships;
- monitoring working relationships and escalating concerns where appropriate; and
- providing mechanisms through which employees and others can report concerns or suspected exploitation.

Where a modern slavery or worker exploitation concern is identified, ETEC will consider the circumstances and severity of the issue and determine an appropriate response.

Depending upon the circumstances, this may include:

- further investigation;
- obtaining additional information from the relevant supplier, contractor or labour provider;
- requiring appropriate corrective action;
- escalation to senior management;
- increased monitoring;
- suspension or termination of the relevant commercial relationship where appropriate; and

- referral to relevant authorities where appropriate.

Etec recognises that the appropriate response should take account of the circumstances and, where potential victims are involved, their welfare and safety.

6. Modern Slavery Risk Assessment and Management

Etec recognises that modern slavery risk is not uniform across all aspects of its business and supply chain.

As a construction business, potentially increased exposure may arise from labour-intensive activities, subcontracted works and extended supply chains, particularly where workers are engaged through third-party organisations.

Areas requiring particular attention include:

- agency and temporary labour;
- subcontracted construction activities;
- specialist and lower-tier subcontracting;
- labour-intensive trades and services;
- recruitment and employment practices;
- third-party labour providers;
- workers who may be vulnerable to exploitation; and
- areas of the supply chain where Etec has less direct visibility over employment practices.

Etec considers **third-party labour providers and subcontractors** to be among its primary areas of potential modern slavery risk.

Etec seeks to assess and manage these risks through a combination of:

- careful selection and verification of labour agencies;
- engagement with reputable organisations;
- expectations regarding ethical recruitment;
- appropriate contractual standards and requirements;
- ongoing management oversight;
- monitoring of supplier and subcontractor relationships;
- workforce reporting and whistleblowing arrangements; and
- escalation and investigation where concerns arise.

Etec will continue to review the nature and level of modern slavery risk as its operations, projects, labour arrangements and supply chain develop.

7. Effectiveness and Key Performance Indicators

Etec recognises that having policies and procedures in place is not, by itself, sufficient to demonstrate that its approach is effective.

The Company therefore assesses the effectiveness of the steps it takes to prevent and address modern slavery through **appropriate performance indicators and management information proportionate to the nature and scale of its operations.**

Etec's key performance indicators include:

Key Performance Indicator How Effectiveness Is Assessed

Modern slavery incidents	Number and nature of confirmed modern slavery or human trafficking incidents identified within Etec's business or brought to Etec's attention in relation to its supply chain
Concerns and suspected cases	Number and nature of modern slavery, exploitation or related concerns raised through management or established reporting and whistleblowing arrangements
Labour agency verification	Monitoring whether new employment agencies are appropriately verified before engagement
Recruitment fee controls	Consideration, as part of relevant agency checks, of whether workers or jobseekers are being charged recruitment fees
Supplier and subcontractor compliance	Monitoring concerns or non-compliance identified through management of supplier and subcontractor relationships
Supply-chain risk	Review of concerns, adverse information or working practices identified through supplier, labour-provider and subcontractor management
Policy compliance	Monitoring compliance with Etec's Modern Slavery Policy and associated Company controls
Mandatory staff training	Monitoring completion of Etec's mandatory staff training requirements through the Company's training matrix
Whistleblowing and reporting awareness	Monitoring relevant staff awareness and concerns raised through established reporting mechanisms
Corrective actions	Monitoring actions taken in response to identified concerns, weaknesses or non-compliance
Modern Slavery Awareness and Training	Monitoring the delivery and completion of Modern Slavery and Human Trafficking awareness through Etec's training, induction, management briefing and compliance arrangements.

Monitoring Effectiveness

Etec considers the absence of reported incidents as one indicator but **does not rely on the absence of reported incidents alone as evidence that its controls are effective.**

The Company also considers whether preventative controls are operating as intended, whether concerns are being appropriately identified and escalated, whether staff training requirements are being completed and whether corrective or preventative action is required.

Where weaknesses, concerns or areas for improvement are identified, Etec will consider appropriate remedial and preventative action.

Etec will continue to review and develop its performance indicators to improve its ability to evaluate the effectiveness of its modern slavery risk-management arrangements and demonstrate year-on-year improvement.

8. Training, Awareness and Capacity Building

Etec recognises that training, awareness and an effective culture of reporting are important components of preventing modern slavery, human trafficking and worker exploitation.

All Etec staff are required to undertake the Company's mandatory training programme, with completion monitored through the Company's training matrix.

The Company's mandatory training and awareness framework includes relevant areas supporting ethical conduct, employee welfare, responsible business behaviour and the identification and reporting of inappropriate conduct, including:

- Whistleblowing;
- Equality and Diversity;
- Anti-Bribery;
- Sexual Harassment Awareness;
- Data Protection;
- Stress Management;
- Drug and Alcohol awareness;
- Lone Working;
- relevant health and safety training; and
- additional role-specific training where appropriate.

Relevant management-level training is also undertaken where applicable.

These arrangements support Etec's modern slavery controls by helping employees understand expected standards of conduct, workplace responsibilities, worker welfare considerations and the mechanisms available for raising concerns about inappropriate, unethical or potentially exploitative behaviour.

EETEC's Modern Slavery Policy complements this training framework by establishing the Company's zero-tolerance approach to modern slavery and human trafficking and requiring employees and those working on the Company's behalf to report suspected concerns through line management or the Company's whistleblowing arrangements.

Modern Slavery and Human Trafficking Awareness

EETEC provides **Modern Slavery and Human Trafficking awareness and capacity building** as part of its established training, induction, management briefing and compliance arrangements.

The awareness provided covers, where relevant:

- understanding modern slavery and human trafficking;
- recognising potential indicators of forced labour and exploitation;
- ethical recruitment and recruitment-fee risks;
- identifying potentially vulnerable workers;
- understanding risks associated with labour agencies and subcontracting;
- knowing how and where to report concerns;
- appropriate escalation of suspected cases; and
- responsibilities of employees and managers under EETEC's Modern Slavery Policy.

Particular focus is given to personnel whose roles may have greater exposure to modern slavery risks, including those involved in:

- procurement and supply-chain management;
- recruitment and labour engagement;
- subcontractor management;
- commercial and contract management;
- site management; and
- health, safety and compliance activities.

EETEC monitors the delivery and completion of relevant training and awareness through its established training and compliance processes, including the Company's training matrix.

EETEC will continue to review the effectiveness of its Modern Slavery and Human Trafficking awareness arrangements and provide refresher or additional role-specific training and awareness where appropriate.

9. Reporting Concerns and Whistleblowing

EETEC encourages employees and others working within its business and supply chain to report concerns relating to suspected:

- modern slavery;
- human trafficking;

- forced or compulsory labour;
- unethical recruitment;
- worker exploitation;
- restriction of workers' freedom;
- inappropriate treatment of workers; or
- other potentially abusive employment practices.

Employees may raise concerns with their line manager or through the Company's established whistleblowing arrangements.

The prevention, identification and reporting of potential modern slavery concerns is a shared responsibility across the organisation.

ETEC seeks to maintain an environment in which genuine concerns can be raised in good faith without fear of retaliation or detrimental treatment.

Reports will be taken seriously, appropriately recorded and escalated according to their nature and severity.

Where credible evidence of modern slavery or serious worker exploitation is identified, ETEC will consider appropriate investigation, remediation and escalation, including engagement with relevant authorities where appropriate.

10. Continuous Improvement and Priorities for 2026/27

ETEC recognises that managing modern slavery risk is an ongoing process requiring continuing review and improvement.

During 2026/27, ETEC intends to continue developing its approach, with particular focus, where appropriate, on:

- maintaining appropriate checks on labour and employment agencies;
- reinforcing modern slavery expectations within supplier and subcontractor relationships;
- strengthening awareness of modern slavery indicators among employees and managers;
- continuing to provide and strengthen Modern Slavery and Human Trafficking awareness through relevant training, induction, management briefings and compliance arrangements;
- monitoring and reviewing appropriate modern slavery performance indicators;
- continuing to monitor completion of mandatory staff training;
- maintaining effective reporting and whistleblowing mechanisms;
- reviewing potentially higher-risk areas within the supply chain;
- continuing to promote ethical recruitment practices;
- reviewing recruitment-fee risks;

- considering opportunities to strengthen supply-chain due diligence; and
- reviewing progress against these commitments as part of the preparation of ETEC's next annual Modern Slavery Statement.

ETEC's **senior leadership and management** will continue to review the Company's approach and consider further measures where proportionate and appropriate to the risks associated with its activities and supply chain.

11. Approval and Senior Management Commitment

This Modern Slavery and Human Trafficking Statement was approved by the senior leadership of ETEC Contract Services Limited on 12 August 2026 and demonstrates the Company's continuing commitment to preventing modern slavery and human trafficking within its operations and supply chains.