



Modern Slavery and Human Trafficking Statement

Modern Slavery Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and set out the steps taken by ATD Civils & Groundworks Limited during the financial year ending March 2027 to prevent modern slavery and human trafficking within our business operations and supply chains.

At ATD Civils & Groundworks Limited, we are committed to conducting our business ethically and with integrity. We recognise our responsibility to identify, prevent and mitigate the risk of modern slavery and human trafficking in all aspects of our operations and supply chain. We have a zero-tolerance approach to any form of slavery, servitude, forced or compulsory labour, debt bondage and human trafficking.

Our Organisation, Business & Supply Chains

ATD Civils & Groundworks Limited is a UK-based construction company providing construction, refurbishment, maintenance and associated building services to clients across the public and private sectors.

Our business activities include:

- Construction and civil engineering projects
- Refurbishment and fit-out works
- Planned and reactive maintenance
- Project management
- Design and build services
- Facilities support (where applicable)

We employ approximately 30 employees across operational, technical and administrative functions and engage specialist subcontractors where appropriate. Our supply chain includes:

- Construction subcontractors
- Labour agencies
- Material manufacturers and suppliers
- Plant and equipment hire companies
- Professional consultants
- Waste management providers
- Transport and logistics companies

Whilst the majority of our suppliers are based within the United Kingdom, some materials, products and components originate from international supply chains, including countries where labour rights protections and procedures designed to prevent modern slavery or forced labour may be less robust.

Policies Relating to Slavery and Human Trafficking

We maintain policies and procedures designed to prevent modern slavery and promote ethical business practices. These include:

- Modern Slavery Policy
- Code of Business Conduct and Ethics
- Supplier Code of Conduct
- Whistleblowing Policy
- Recruitment and Employment Policy
- Equality, Diversity and Inclusion Policy
- Procurement Policy
- Anti-Bribery and Corruption Policy

Our recruitment processes ensure that all employees have the legal right to work in the UK and are employed voluntarily under fair and lawful employment conditions. Employees are encouraged to report concerns confidentially through our whistleblowing arrangements without fear of retaliation.

We expect all suppliers, subcontractors and business partners to uphold equivalent standards and comply with all applicable employment legislation.

Due Diligence Processes

To minimise the risk of modern slavery, we operate a proportionate due diligence programme covering both our direct operations and our supply chain. Our due diligence activities include:

- Supplier pre-qualification assessments
- Verification of company registration and trading status
- Review of suppliers' labour standards and employment practices
- Assessment of suppliers' modern slavery policies where appropriate
- Right-to-work checks for directly employed workers
- Verification of labour agency compliance
- Monitoring of subcontractor performance throughout project delivery
- Contractual requirements requiring suppliers to comply with the Modern Slavery Act 2015
- Investigation of any allegations or reports of unethical employment practices

Where concerns are identified, we engage with suppliers to seek corrective action or, where appropriate, terminate commercial relationships.

Risk Assessment and Risk Management

The construction industry has recognised areas of increased risk relating to modern slavery due to the extensive use of subcontracting, temporary labour and complex supply chains.

Within our business, we consider the following areas to present the highest potential risk:

- Labour-only subcontracting
- Temporary labour providers
- Recruitment agencies

- Imported construction materials
- Manufactured building products sourced from higher-risk jurisdictions
- Low-skilled manual labour
- Cleaning, security and site welfare services

To manage these risks, we:

- Conduct supplier risk assessments
- Require suppliers to demonstrate legal employment practices
- Use approved and reputable labour agencies
- Monitor subcontractor compliance during site audits
- Include modern slavery obligations within procurement documentation
- Review higher-risk suppliers more frequently
- Encourage reporting of concerns by employees, subcontractors and third parties
- Work collaboratively with clients and supply chain partners to improve labour standards.

Measuring Effectiveness

We continually monitor the effectiveness of our approach to preventing modern slavery through a range of performance indicators.

These include:

- Percentage of key suppliers assessed for modern slavery risk
- Number of supplier due diligence reviews completed
- Number of supplier compliance issues identified
- Number of whistleblowing reports relating to labour exploitation
- Percentage of employees completing modern slavery awareness training
- Number of site inspections including labour welfare checks
- Corrective actions implemented following supplier reviews
- Annual review of company policies relating to ethical procurement

During the reporting period:

- No confirmed incidents of modern slavery were identified within our direct workforce
- Any concerns raised were investigated in accordance with company procedures
- Supplier monitoring activities were completed in line with our procurement programme

We recognise that preventing modern slavery requires continuous improvement and we will regularly review our procedures and performance.

Training and Capacity Building

We provide training to employees whose roles involve recruitment, procurement, contract management and site supervision to enable them to identify and respond appropriately to potential indicators of modern slavery. Training covers:

- Understanding modern slavery and human trafficking

- Indicators of labour exploitation
- Responsibilities under the Modern Slavery Act 2015
- Ethical recruitment practices
- Supply chain risk awareness
- Reporting procedures and whistleblowing
- Supplier engagement and due diligence

Managers responsible for procurement and project delivery receive additional guidance on assessing supplier compliance and managing identified risks. We intend to continue expanding awareness across the organisation through refresher training, toolbox talks and supplier engagement activities.

Continuous Improvement

Over the next reporting period, ATD Civils & Groundworks Limited intends to:

- Review and enhance supplier due diligence processes
- Increase supplier engagement regarding ethical labour standards
- Improve risk assessment methodologies
- Expand modern slavery awareness training across the workforce
- Continue reviewing procurement practices to strengthen supply chain transparency

Signed:



Director: A NICHOLLS

Date: 23 July 2026

ATD CIVILS & GROUNDWORKS LIMITED