

# General statement of intent – Modern Slavery

## Introduction – Policy Statement

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1st March 2025 to 31st March 2026.

The statement sets down Wilten Construction Ltd's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

## Summary

Over the past 12 months we have taken the following steps to reduce the risk of Modern Slavery and Human Trafficking:

- Further development and implementation of a Modern Slavery training course available as a mandatory training course for every employee and hosted by the Supply Chain Sustainability School's e-learning portal
- Our policy statement has been reviewed and updated to reinforce our zero-tolerance approach to any form of slavery and human trafficking including the use, in any form, of forced labour
- Continued implementation and embedment of our management System and Procedures including Right to Work

## Organisational Structure and Supply Chains

This statement covers the business activities of Wilten Construction Ltd from our Head Office in Market Harborough which are as follows:

We are a national main contractor and project management provider operating in industrial and commercial sectors including fit-out.

The Company currently operates in the following countries:

- United Kingdom

Wilten Construction Ltd is committed to providing a safe, diverse, efficient, integrated, and sustainable organisation, which reflects all segments of the community in our operations and relationships. Our supply chain approach is open, flexible and deals with a mix of local/ national/ SME suppliers. Our supply chain comprises the engagement of capable suppliers and subcontractor organisations to carry out works and services on our construction sites and the sourcing of materials and manufactured products. We are committed to ensuring that slavery and human trafficking plays no part in our supply chain or any part of our business.

Our strategy for supply chain management is founded on the premise that improving company and project performance depends on jointly improving performance with our Suppliers. Inherent in this process is the selection of organisations with whom we develop close working relationships to deliver continual improvement and develop mutually beneficial partnerships.

We actively manages its relationships with our supply chain. There are clear contractual arrangements in place with all direct suppliers, who are required to sign up to our Standard Terms & Conditions.

## Policy

Wilten Construction Ltd is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms our intention to act ethically in our business relationships.

As legally required in compliance with the Modern Slavery Act 2015, the policy is reviewed, at least, annually and is signed by the Director, Naim Basha.

Company Name	Signed by	Review due date
Wilten Construction Ltd	Naim Basha	11/03/2026

## Due Diligence Processes for Slavery and Human Trafficking

Wilten Construction Ltd undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes the building of long-standing relationships with suppliers and making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier &/or invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

For subcontractors and suppliers, we ensure they provide a copy of their latest annual anti-slavery and human trafficking statement via our FO3 Subcontractor Pre-qualification Questionnaire. This is to be completed by all suppliers / subcontractors on application to be a member of our approved supply chain and prior to every contract being awarded. The completed form should contain the signature of the person signing on behalf of the sub-contractor/ supplier (not a photocopy). These are to be kept at Head Office for new accounts and on site for each contract placed.

## Risk Assessment and Management

We deem the risk of slavery or human trafficking occurring within Wilten Construction's direct employee population, or our agency/contract staff and subcontractors under our direct supervision, to be low.

## Key Performance Indicators

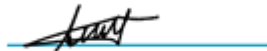
- No. of incidents or Modern Slavery or Human Trafficking recorded – Zero
- No. issues raised, or reported, via the application and implementation of our Whistleblowing Policy and Procedures – Zero

## Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all employees to attend a short training presentation where the company modern slavery training presentation is delivered within the first 2 months of employment.

Naim Basha - Director

Signed -



March 11, 2025

Company Name	Signed by	Review due date
Wilten Construction Ltd	Naim Basha	11/03/2026