



MODERN DAY SLAVERY ACT 2015 POLICY STATEMENT

Organisational Structure

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that ESG Limited has taken during the financial year ending 31st December 2025 to prevent modern slavery and human trafficking within our business operations and supply chains.

ESG has zero tolerance for slavery, servitude, forced or compulsory labour, debt bondage and human trafficking. We recognise that modern slavery is a global issue that can occur within construction, labour supply chains, material sourcing and outsourced services. We commit to respecting all human rights, in alignment with international human rights standards, including the Universal Declaration of Human Rights. This commitment is a core aspect of our corporate values and is embedded in all levels of our business operations.

We are committed not only to complying with the Act but to exceeding its requirements through proactive governance, measurable performance indicators and transparent reporting aligned with ESG best practice. We all have a responsibility to be aware of the risks, however small in our business and wider supply chain. As a company operating within the construction industry, we understand that modern slavery can pose enhanced risks within our supply chains and workforce, and we are dedicated to preventing these practices. Staff are expected to report concerns, using appropriate reporting channels and management are expected to act upon them.

Our Business and Supply Chains

ESG Limited is a construction company involved in providing MEP solutions to the construction industry, across a variety of sectors including data centres, life sciences, residential, commercial, fit out and offsite modular engineering. The organisation operates within the construction industry and employs more than 300 P.A.Y.E. staff across the site network and head office. We operate across the UK, and our supply chain includes a wide range of contractors, subcontractors, and suppliers providing materials, labour, and services. Our business is organised for operational purposes across multi-site locations, a factory setting in Rochford and a London office; all overseen by Head Office in Romford.

Given the complexity and scale of our industry, we are aware of the potential risks of modern slavery within both direct and indirect areas of our operations, particularly in the recruitment of labour and sourcing of materials. We are committed to preventing any form of modern slavery from taking place in our business and among our supply chain partners.

We procure a wide range of goods and services through a diverse supply chain, which includes:

- Main contractors
- Subcontractors who provide materials, labour and plant
- Manufacturers and suppliers who deliver direct to site or to the Subcontractor
- Utility companies, and
- Professional and specialist consultants linked to core activity.

Several of our suppliers meet the turnover threshold requiring them to publish their own slavery and



human trafficking and our supply chain contracts require compliance with the Act as standard. We have a stable supply chain allowing us to benefit from a significant number of long-standing trading relationships with like-minded Subcontractors, Suppliers and Consultants who share our values and ethics. We actively encourage all our suppliers, notwithstanding the contents of the Act, to ensure that they comply with the spirit and intent of the Act.

The materials that are ordered directly by our Head Office or indirectly by our subcontractors are procured, in the main, under a National Supply Agreement by our centrally based Procurement Department who apply due diligence and tender processes via supplier evaluations.

Our Commitment to Ethical Business Practices

We are fully committed to eliminating modern slavery from our operations. While most of our activities are UK-based, we recognise that risks can arise in higher-risk areas such as labour-intensive subcontracted works, agency labour and recruitment intermediaries, seasonal or temporary labour supply, and the sourcing of construction materials and imported goods, including overseas manufacturing within extended supply chains. Although we do not trade directly with companies outside the UK unless instructed by a client, we acknowledge that upstream supply chains may involve international sourcing. Within the construction and project environment, we recognise heightened risks associated with multi-tier subcontracting chains, labour-only subcontractors, agency and temporary workforces, materials including steel, timber, aggregates, PPE and MEP components, facilities management and cleaning services, migrant worker vulnerability, and the use of payment intermediaries or umbrella companies. In line with this risk profile, we have implemented several proactive mitigation measures:

- 1. Due Diligence and Risk Assessment:** We conduct rigorous due diligence on all new suppliers, contractors, and subcontractors, particularly those in higher-risk areas such as labour recruitment, material sourcing, and overseas suppliers. We assess the risk of modern slavery within these operations and take appropriate steps to ensure compliance with ethical labour standards.
- 2. Supplier Management:** Our human rights and social performance standards apply not only to our operations but also to our suppliers and subcontractors. We are committed to combatting slavery and human trafficking. We do not trade directly with any company outside of the U.K. unless specifically instructed to do so by a client. All suppliers, contractors, and subcontractors are expected to comply with our human rights and labour standards as a condition of doing business with us. This agreement specifically requires that all new suppliers confirm their understanding of the Modern Slavery Act 2015 and that they operate in full compliance with the Act; ensuring that workers are treated fairly, with dignity and respect.
- 3. Recruitment and Workforce Management:** We maintain robust and ethical recruitment and workforce management practices to ensure all employees and agency workers are treated fairly and lawfully. All candidates must provide proof of their Right to Work in the UK in accordance with the Immigration, Asylum and Nationality Act 2006, with verification checks conducted through an external system (OPTI) to ensure compliance. Agency labour is sourced exclusively from trade body-affiliated providers who are regularly audited to confirm ethical recruitment, correct pay, and appropriate working conditions. All workers receive written contracts clearly outlining their rights and



responsibilities, and we actively support freedom of association and collective bargaining without fear of discrimination or retaliation. As a Living Wage employer, we pay all employees directly into a bank account of their choice, with secure, individual access to payroll information via ADP using multi-factor authentication.

4. **Training and Awareness:** To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide ongoing training for our employees and contractors, particularly those involved in procurement, project management, and recruitment. The training covers the risks associated with modern slavery, how to spot potential indicators of exploitation, and the steps to take should any concerns arise. We do this via a variety of online training and toolbox talks.

5. **Monitoring and Auditing:** To ensure ongoing compliance, we regularly monitor our supply chains and perform audits where necessary. We assess compliance with our ethical standards and investigate any reports of suspected modern slavery or exploitation.

6. **Whistleblowing and Reporting Mechanisms:** We have put in place a clear and confidential whistleblowing mechanism for workers, suppliers, and other stakeholders to report any concerns about modern slavery. Reports can be made without fear of retaliation. All allegations are investigated promptly and appropriately.

7. **Remediation and Corrective Action:** Should any instances of modern slavery be identified; we are committed to taking immediate corrective action. This may include providing support to affected individuals, working with relevant authorities, and reviewing and amending our practices and relationships with suppliers or subcontractors.

8 **Governance and accountability** are embedded at the highest level of the organisation, with annual Board approval of this Statement and a designated Modern Slavery Lead at Senior Management level. A cross-functional Compliance Committee comprising Audit, HR, Procurement, Health & Safety, and Finance oversees implementation, with quarterly modern slavery risk reporting provided to the Board. Modern slavery risk is integrated into the Enterprise Risk Management (ERM) framework and included within the internal audit programme. It is further embedded within procurement controls, contractor approval processes, and project mobilisation procedures to ensure consistent oversight and risk mitigation.

Our Policies

To support our commitment to combat modern slavery, we have implemented the following policies:

- **Anti-Slavery and Human Trafficking Policy** – sets out our commitment to preventing modern slavery and the procedures for addressing any incidents.
- **Whistleblowing Policy** – ensures that any concerns about unethical or illegal practices, including modern slavery, can be reported safely and anonymously.
- **Equal Opportunities and Diversity Policy** – promotes equality, diversity, and the fair treatment of all workers.

Conclusion

At ESG Limited, we are fully committed to preventing modern slavery in all its forms and ensuring



that all individuals involved in our operations are treated with fairness, dignity, and respect. We recognise that the construction industry presents unique challenges, and we are committed to working proactively with our suppliers and contractors to reduce risks of exploitation and modern slavery.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We do this via a variety of online training and toolbox talks. We also require our business partners to provide training to their staff and suppliers/ providers.

Further Steps

To demonstrate the effectiveness of our approach, we will measure and report against a comprehensive set of construction sector-specific KPIs. At a governance level, we will ensure 100% Board approval of our annual Statement and provide quarterly compliance reporting to the Board. All high-risk suppliers will be reviewed annually to maintain robust oversight and accountability.

In relation to supplier due diligence, 100% of new subcontractors will be subject to modern slavery pre-qualification screening prior to engagement. At least 95% of Tier 1 subcontractors will be contractually bound to anti-slavery clauses, and a minimum of 75% of identified high-risk suppliers will be audited each year, either through desktop assessments or site-based reviews. We will verify that 100% of labour agencies engaged are members of recognised trade bodies to ensure ethical and legal compliance.

Our workforce controls will remain rigorous. All Right to Work checks will be verified through an external system (OPTI), and 100% of employees will be paid directly into bank accounts individually nominated by them. We will maintain full compliance with our Living Wage commitment and operate a zero-tolerance KPI of zero substantiated cases of forced labour.

Training and awareness will be central to prevention. We will require 100% of Procurement, HR, and Project Managers to complete annual modern slavery training, while at least 85% of site supervisors will receive toolbox talk refreshers. Modern Slavery awareness will be embedded within all new starter inductions, and we will target an annual refresher training completion rate of at least 95%.

Monitoring and reporting mechanisms will further strengthen our framework. All whistleblowing reports will be acknowledged within 48 hours, and 100% of substantiated concerns will be formally investigated. Corrective action plans will be implemented within 30 days of any confirmed breach, and we will complete an annual supply chain risk mapping exercise to identify emerging risks.

Finally, we will commit to continuous improvement by tracking year-on-year increases in supplier risk transparency, conducting annual reviews of high-risk material categories, and, where feasible, commissioning independent reviews of policy effectiveness to ensure our controls remain robust, proportionate, and effective.



Further Steps

This statement is approved by the Board of Directors of ESG Limited and is reviewed annually to ensure that it remains current and effective in addressing modern slavery risks within our business and supply chain.

We will continue to review the effectiveness of this policy and will look to ensure that we are adopting best practice and enforcing effective systems to prevent, monitor and eliminate slavery and Human trafficking.

For transparency, the company will publish the Modern-Day Slavery and Trafficking Act 2015 Policy

Statement on its website for public review.

This policy applies to all those employed by Essex Services Group Ltd.

A handwritten signature in black ink, appearing to read 'Andy Hider'.

Andy Hider
Managing Director

A handwritten signature in black ink, appearing to read 'Adam Cecil'.

Adam Cecil
Managing Director

Reviewed: March 2026

Next Review Due: 31 March 2027