

Modern Slavery Statement and Policy

Policy Statement

Buxton Building Contractors Ltd is committed to preventing modern slavery, human trafficking, forced labour, and exploitation in all its operations and supply chains.

The Company adopts a zero-tolerance approach to modern slavery and is committed to acting ethically, with integrity and transparency, in all business dealings.

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and relates to the financial year 2024/2025.

Scope

This policy applies to:

- All employees, directors, and temporary staff
 - Subcontractors, suppliers, and consultants
 - All business operations and supply chain activities
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Business and Supply Chain

Buxton Building Contractors Ltd is a UK-based main contractor operating primarily across London and the Home Counties.

Our supply chain includes:

- Design consultants and engineers
- Subcontractors and specialist trades
- Labour providers and agencies
- Material suppliers and service providers

The Company recognises that construction supply chains can present increased risk and requires a robust approach to managing these risks.

Risk Assessment

The Company adopts a risk-based approach to identifying and managing modern slavery risks.

This includes:

- Assessing supply chain and project-related risks
- Reviewing geographic and sector risks
- Identifying high-risk activities, including labour-intensive trades and agency labour

The Company will apply enhanced scrutiny where higher risks are identified.

Due Diligence

The Company undertakes due diligence when engaging and reviewing suppliers, including:

- Evaluating modern slavery risks during supplier onboarding
- Requiring compliance with the Modern Slavery Act 2015
- Reviewing supplier performance and practices periodically
- Incorporating modern slavery considerations into supplier audits
- Taking corrective action where issues are identified
- Terminating relationships where serious breaches occur

Where appropriate, suppliers are required to:

- Demonstrate compliance through accreditation systems (e.g. Constructionline)
- Provide evidence of ethical labour practices

Policies and Controls

The Company maintains policies that support the prevention of modern slavery, including:

- **Whistleblowing Policy** – enabling confidential reporting of concerns
- **Code of Conduct** – setting standards of behaviour and ethics
- **Anti-Fraud and Anti-Bribery Policies** – addressing financial crime risks
- **Recruitment and Agency Workers Policy** – ensuring ethical labour sourcing
- **Harassment-Free Workplace Policy** – promoting dignity and respect

These policies form part of the Company's overall governance framework.

Training and Awareness

The Company will:

- Provide training to relevant employees, particularly those involved in procurement and supply chain management
- Raise awareness of modern slavery risks across the business
- Promote understanding of how to identify and report concerns

Training will include:

- Indicators of modern slavery
- Risk assessment and due diligence
- Reporting and escalation procedures

Awareness is also supported through:

- Site and office communications
- Posters and guidance materials

- Toolbox talks where appropriate
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Reporting Concerns

Any concerns relating to modern slavery or human trafficking must be reported promptly.

Reports may be made to:

- A line manager; or
- A Director; or
- The Finance Director; or
- Through the Company's Whistleblowing Policy

Concerns will be treated seriously and handled confidentially.

The Company will not tolerate retaliation against anyone who raises a concern in good faith.

Responsibilities

Directors

- Provide oversight and ensure compliance with this policy

Managers

- Implement due diligence and monitor risks within their areas
- Escalate concerns appropriately

Employees and Associated Persons

- Remain vigilant to risks
 - Report concerns promptly
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Monitoring and Continuous Improvement

The Company will:

- Review and update its approach to managing modern slavery risks
 - Enhance due diligence and audit processes where required
 - Monitor developments in legislation and best practice
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Approval and Review

This statement has been approved by the Managing Director and will be reviewed annually.



David Norman
Managing Director
Buxton Building Contractors Ltd

Date: April 2026

Next Review Date: April 2027