

Modern Slavery Statement



This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and sets out the steps Hannafin Contractors Limited ("Hannafin", "we", "our", or "the Company") has taken during the financial year to ensure that modern slavery and human trafficking are not taking place in our own business or in our supply chains.

1. Organisation Structure, Business and Supply Chains

Hannafin Contractors Limited is a UK-based groundworks and civil engineering contractor, providing services including substructure works, earthworks, drainage, utilities, reinforced concrete structures, and associated civils activities.

Our operations are carried out by direct employees, subcontractors, and temporary labour supplied through accredited recruitment agencies.

Our supply chain includes:

- Labour and recruitment agencies
- Subcontracted trades within construction and groundworks
- Plant and equipment suppliers
- Aggregate, concrete, and materials suppliers
- Professional and consultancy services

We recognise the construction sector carries elevated risks related to labour exploitation, particularly in labour supply and raw material production.

2. Policies in Relation to Slavery and Human Trafficking

We maintain a strong framework of policies to protect workers and prevent exploitation:

- Modern Slavery & Human Trafficking Policy
- Supplier Code of Conduct
- Whistleblowing Policy – enabling employees and third-parties to report concerns confidentially, including suspected modern slavery.
- Equal Opportunities Policy (Including Recruitment and Selection)
- Anti-Harassment and Bullying Policy
- Anti-Corruption and Bribery Policy

Policies are reviewed annually and updated as needed.

3. Due Diligence Processes

To identify and mitigate potential modern slavery risks, we undertake the following due diligence:

- Conduct pre-qualification checks for new suppliers and subcontractors, including their compliance with the Modern Slavery Act.
- Require labour providers to demonstrate licensing, compliance processes, and right to work procedures.
- Verify identity and eligibility to work for all employees and agency workers.
- Maintain clear contractual requirements prohibiting forced, bonded, or trafficked labour.
- Monitor ongoing compliance through periodic reviews and site audits.

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Where concerns are identified, we take immediate action, including suspension or termination of supplier relationships.

4. Risk Assessment and Management

We assess modern slavery risks across our operations and supply chain annually. Key risk areas include:

- Labour supply – especially temporary labour within construction trades
- Subcontracted packages – where oversight may be less direct
- Materials sourced globally – where labour protections vary by region

To manage these risks, we take steps including stronger supplier vetting, ongoing monitoring, and mandatory compliance declarations.

5. Effectiveness and Performance Indicators

To measure the effectiveness of our actions in combatting modern slavery, we track:

- Supplier compliance with our due-diligence requirements
- Completion rates of modern slavery awareness training
- Findings from internal audits and supplier reviews
- Use of whistleblowing channels
- Any identified incidents or corrective actions taken

No instances of modern slavery or human trafficking have been identified within our operations or supply chain during this reporting period.

6. Training on Modern Slavery and Human Trafficking

We provide training to ensure our workforce understands the indicators of modern slavery and how to respond. This includes:

- Induction training for all new employees
- Toolbox talks across live construction sites
- Annual refresher materials and guidance

Training ensures staff can recognise warning signs and escalate concerns appropriately.

7. Future Commitments

In the coming year, Hannafin Contractors Limited commits to:

- Enhancing supply-chain auditing, particularly for higher risk categories
- Strengthening subcontractor and labour provider screening
- Expanding training coverage across all operational levels
- Further reviewing and improving our policies and reporting processes

Our goal is to continually strengthen our approach and uphold the highest ethical standards.

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8. Approval

Name	Peter Hannafin B.Eng
Position	Managing Director
Date	1 st January 2026
Signature	<i>P Hannafin</i>
Review	1 st January 2027