

# Modern Slavery Policy

## 2026

This statement is made pursuant to section 54(6) of the Modern Slavery Act 2015 and sets out the steps that Triton Construction Limited (“the Company”) has taken during the financial year ending 2025 to prevent modern slavery and human trafficking in its business operations and supply chains.

### a. Organisation Structure, Business and Supply Chains

The Company operates within the construction sector in the United Kingdom, providing construction and related services. Its organisational structure comprises a Board of Directors, supported by senior management and operational teams. The Company engages a range of subcontractors, suppliers, and service providers, forming a multi-tiered supply chain including labour provision, materials sourcing, plant hire, and professional services.

### b. Policies in Relation to Slavery and Human Trafficking

The Company is committed to conducting its business with integrity and in accordance with applicable laws and ethical standards. It has implemented an Anti-Slavery and Human Trafficking Policy, which reflects its zero-tolerance approach to modern slavery. In addition, the Company maintains a Whistleblowing Policy, enabling employees and other stakeholders to raise concerns confidentially regarding suspected wrongdoing, including matters relating to modern slavery. These policies are communicated to employees and are accessible via the Employee Handbook.

### c. Due Diligence Processes

The Company undertakes due diligence in relation to its supply chain to identify and mitigate risks associated with modern slavery. All subcontractors and supply chain partners are required to complete a Pre-Qualification Questionnaire (PQQ), which is subject to independent review by the Company’s insurers. This process is designed to assess compliance with legal obligations and the Company’s standards regarding workforce welfare and employment practices.

### d. Risk Assessment and Management

The Company acknowledges that certain aspects of the construction industry present an elevated risk of modern slavery and human trafficking. Accordingly, it has conducted a comprehensive assessment of its business operations and supply chains to identify areas of potential risk. Where risks are identified, appropriate mitigation measures are implemented, including enhanced due diligence and monitoring. The Company also ensures that all employees and agency workers are subject to right-to-work checks and that no form of bonded, forced, or involuntary labour is utilised.

### e. Effectiveness and Performance Indicators

The Company monitors the effectiveness of its measures to prevent modern slavery through appropriate performance indicators, including:

- Completion and review of supply chain due diligence processes;
- Monitoring and investigation of whistleblowing reports;
- Periodic compliance checks within the supply chain;
- Verification of right-to-work documentation for employees and agency workers; and
- Adherence to statutory wage requirements, including payment of at least the National Minimum Wage.

These indicators are reviewed to assess the adequacy and effectiveness of the Company’s procedures.

### f. Training and Capacity Building

The Company is in the process of implementing a structured training programme to ensure that employees at all levels are aware of the risks of modern slavery and are familiar with the Company’s policies and procedures. Refresher training will be provided as appropriate. The Company also expects its supply chain partners to provide relevant training within their own organisations.

### Governance and Responsibility

Responsibility for the implementation and oversight of the Company’s approach to modern slavery rests with the Compliance Manager, Gillian Powell, in conjunction with the Managing Director. They are responsible for ensuring the effective application of policies and procedures and for the preparation of this annual statement. The Company is committed to continuous improvement in its approach to combating modern slavery and human trafficking and will review and update its practices and this statement on an annual basis.

This statement has been approved by the Board of Directors and is signed on its behalf.



**Paul Clarkson – Managing Director 02.01.2026**

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