MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Policy owner: Managing Director
Approved by: Matthew Barton, Managing Director
Effective date: October 2026
Review date: October 2027
Version: 1.0

1. Policy Statement

Barton Knight Contracting Ltd is committed to preventing modern slavery, human trafficking, forced labour and exploitation within its business operations and supply chains.

We recognise that modern slavery is a serious violation of human rights and that risks may exist within the construction industry, electrical contracting sector, subcontracted labour and the manufacture and supply of electrical materials and equipment.

We operate a zero-tolerance approach to modern slavery and expect all employees, subcontractors, suppliers and other business partners to uphold appropriate standards of ethical conduct and respect for human rights.

We are committed to conducting our business responsibly, complying with applicable legislation and taking proportionate steps to identify, prevent and address modern slavery risks.

2. Scope

This policy applies to:

- All employees, including temporary workers and apprentices.
- Directors and management.
- Subcontractors and labour providers.
- Suppliers of electrical materials, equipment, tools and other products.
- Agencies, consultants and other business partners acting on our behalf.

We expect organisations within our supply chain to maintain appropriate employment practices and take reasonable steps to prevent modern slavery within their own operations and supply chains.

3. Legal and Regulatory Compliance

Barton Knight Contracting Ltd is committed to complying with applicable UK legislation relating to modern slavery, including the Modern Slavery Act 2015.

We recognise that Section 54 of the Modern Slavery Act 2015 places a statutory obligation on certain commercial organisations meeting the relevant turnover threshold to publish an annual modern slavery statement.

Where our organisation is not legally required to publish a statement, we remain committed to taking proportionate steps to identify and manage modern slavery risks within our operations and supply chains.

4. Areas of Potential Risk

We recognise that modern slavery risks may arise in several areas relevant to our business, including:

- Subcontracted labour and temporary workers within the construction and electrical contracting sectors.
- Labour providers and recruitment agencies.
- The manufacture and distribution of electrical cables, lighting, electrical components, batteries, solar panels and other construction materials.
- Overseas manufacturing and sourcing arrangements where labour protections or enforcement may be weaker.
- Complex supply chains where there is limited visibility of working conditions or the origin of products.

We acknowledge that our visibility of the full supply chain may vary depending on the supplier and product. We will seek to improve our understanding of these risks through proportionate supplier checks and engagement.

These are recognised areas of potential risk and do not constitute findings that modern slavery has occurred within our own operations or supply chain.

5. Recruitment and Employment Practices

We are committed to fair and lawful employment practices.

Our approach includes:

- Ensuring employees are engaged on appropriate employment terms.
- Prohibiting forced, bonded or involuntary labour.
- Prohibiting child labour and any employment arrangements that are unlawful or exploitative.
- Ensuring workers are legally entitled to work in the UK, with appropriate checks carried out in accordance with applicable legislation.
- Prohibiting the withholding of identity documents or the use of threats, coercion or intimidation to control workers.
- Expecting recruitment and labour providers to operate lawfully and ethically.
- Ensuring that workers are not charged unlawful recruitment fees or subjected to exploitative recruitment practices.

We expect workers to be treated fairly, with dignity and respect, and to be able to raise concerns without fear of retaliation.

6. Supplier and Subcontractor Due Diligence

We recognise that our supply chain is an important area in which modern slavery risks must be considered.

When appointing suppliers and subcontractors, we will take a proportionate approach to assessing the nature of the goods or services supplied and the associated risks.

Where appropriate, this may include:

- Considering the supplier's reputation, business practices and employment arrangements.
- Requesting confirmation that suppliers and subcontractors comply with applicable employment and modern slavery legislation.
- Reviewing relevant policies, statements or other evidence of responsible business practices.

- Asking suppliers about the origin of products and materials where this information is relevant to identifying potential risks.
- Considering the use of labour agencies and subcontracting arrangements.
- Investigating credible concerns or indicators of exploitation.
- Reviewing existing supplier relationships where concerns are identified.

Where a supplier or subcontractor is unable or unwilling to address credible concerns, we may consider suspending work, requiring corrective action or terminating the business relationship, subject to contractual obligations and applicable law.

We recognise that not all suppliers will have the same level of resources or formal policies. Our approach will therefore be proportionate to the nature and level of risk.

7. Employee Awareness and Responsibilities

All employees and representatives of Barton Knight Contracting Ltd are expected to act ethically and remain alert to potential indicators of modern slavery.

Potential indicators may include:

- Workers appearing to be under the control of another person.
- Evidence of intimidation, threats or coercion.
- Workers who appear unable to leave their employment freely.
- Withholding of wages, passports or identity documents.
- Signs that workers are living or working in exploitative conditions.
- Inconsistencies or concerns regarding recruitment or labour arrangements.

These indicators do not automatically establish that modern slavery is occurring, but they should be treated seriously and reported for appropriate assessment.

We will raise awareness of modern slavery risks with relevant personnel where appropriate to their roles and responsibilities.

8. Reporting Concerns

Any employee, subcontractor, supplier or other business partner who suspects modern slavery or human trafficking within our operations or supply chain should report their concerns to the Managing Director.

All concerns will be taken seriously and assessed appropriately.

We will seek to:

- Investigate credible concerns promptly and sensitively.
- Protect individuals who raise concerns in good faith from retaliation.
- Maintain appropriate confidentiality, subject to legal obligations and the need to investigate.
- Refer suspected criminal activity to the appropriate authorities where necessary.
- Take appropriate action where exploitation or non-compliance is identified.

Where there is an immediate risk to an individual's safety, the appropriate emergency services or relevant authorities should be contacted.

9. Management Responsibility

The Managing Director has overall responsibility for this policy and for ensuring that modern slavery risks are considered within the organisation's business activities.

Management is responsible for promoting compliance with this policy and considering potential risks when appointing suppliers, subcontractors and labour providers.

Employees and other relevant parties are responsible for following the policy and reporting concerns.

10. Monitoring and Review

This policy will be reviewed at least annually, or sooner if there are significant changes to our operations, relevant legislation or the risks identified within our supply chain.

As part of the review, we will consider:

- Whether our approach to supplier and subcontractor checks remains appropriate.
- Whether any concerns or incidents have been reported.
- Whether additional employee awareness or guidance is required.
- Whether improvements can be made to our supply-chain visibility and risk management.

Where appropriate, we will maintain records of supplier checks, concerns raised, investigations and corrective actions.

11. Communication and Availability

This policy will be communicated to relevant employees and management and made available to suppliers and subcontractors where appropriate.

Barton Knight Contracting Ltd will consider making this policy publicly available as part of its commitment to responsible business practices and transparency.

12. Approval

This policy has been prepared to support Barton Knight Contracting Ltd's commitment to preventing modern slavery and human trafficking.

This policy has been approved by



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Managing Director
Barton Knight Contracting Limited
Date: 19/10/2026