



Modern Slavery Act

CHAPTER 30

2015

Anti-Slavery Policy

2025-2026

Modern Slavery Statement

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and outlines the steps that **Procon Management Services Ltd. T/A Procon Modular** has taken to identify, assess, and address modern slavery and human trafficking risks in our operations and supply chains.

OUR COMMITMENT

We are committed to preventing modern slavery and human trafficking in all areas of our operations and supply chains. We recognise our responsibility to respect human rights and to take proactive steps to ensure that slavery, servitude, forced or compulsory labour, and human trafficking do not occur.

RISK ASSESSMENT AND SUPPLY CHAIN MANAGEMENT

We acknowledge the construction sector's exposure to modern slavery risks, particularly in relation to:

- Labour-intensive trades involving temporary or migrant workers
- Subcontracted labour and agency staffing
- Sourcing of materials such as timber, steel, and PPE from global supply chains

We have conducted a high-level risk assessment to identify where the greatest vulnerabilities may lie and prioritise due diligence in high-risk areas.

POLICIES AND PROCEDURES

We have implemented the following policies and procedures to support our modern slavery commitments:

- Code of Conduct - setting standards for employee and supplier behaviour
- Whistleblowing Policy - enabling confidential reporting of concerns
- Procurement Policy - embedding ethical sourcing principles into our processes

All staff and key suppliers are made aware of these policies and expected to comply with them.

DUE DILIGENCE AND CONTRACTUAL CONTROLS

We conduct due diligence on key suppliers and subcontractors, particularly those operating in higher-risk jurisdictions or providing labour.

Measures include:

- Requiring suppliers to confirm compliance with anti-slavery laws
- Including modern slavery clauses in contracts
- Reviewing certifications such as Ethical Trading Initiative (ETI) or SEDEX membership

TRAINING AND AWARENESS

We deliver training and awareness sessions to relevant staff, particularly within procurement, HR, and site management teams. The training provided covers:

- How to identify signs of modern slavery
- How to report concerns internally or to external authorities
- The importance of protecting vulnerable workers

MONITORING AND CONTINUOUS IMPROVEMENT

We are committed to continuous improvement in tackling modern slavery risks. In the coming years, we aim to:

- Strengthen supply chain mapping
- Introduce targeted audits in high-risk trades
- Expand training across our supply chain
- Improve reporting mechanisms for workers on site

APPROVAL

This statement and our arrangements have been approved by our Board of Directors and will be reviewed annually and updated in line with regulations and guidance for ongoing compliance.

Eoin Daly

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Managing Director

10/06/2025