Modern Slavery & Human Trafficking Policy Statement

Structure, business, and supply chain

This Modern slavery and Human Trafficking Statement relate to actions and activities during the financial year September 2023- August 2024.

We are serious about our business because it is part of our identity and so is our commitment to corporate social responsibility. We believe transparency is the best way we can assure the public that we are doing our best as an ethical corporate company. In that spirit, we have published our annual statement for slavery and human trafficking, made in compliance with section 54 of the Modern Slavery Act 2015, in which we explain how slavery and human trafficking can affect our business and the steps we are taking in the fight against it. This statement is intended to fulfil the legal requirement for a slavery and human trafficking statement on behalf of all companies within the Masterson Holdings Group, as relevant. Our efforts against slavery and human trafficking complement our broader CSR Policy.

Masterson Holdings Limited is a construction group based in the UK. The group's businesses are leaders in the following sectors across London and the Home Counties.

- Getjar Limited – reinforced Concrete Frames
- Atlantic Contracts Limited – Carpentry and Joinery
- Masterson Groundworks – Groundworks
- Glencoe Plant Hire – Plant Hire.

The nature of our business requires that we work in conjunction with a range of suppliers, subcontractors, agencies, and professionals. All our work is conducted in accordance with UK Government tax regulations and UK's health and safety regime.

We have over 198 employees within our organisation in addition to approximately 312 Sub-contractors. Where possible, we engage suppliers who have relationships with existing

suppliers so that we can contain our supplier network and improve consistency in ethical practices throughout the supply chain.

Building on our existing CSR Policy and our commitment, we have embraced the requirement to publish an annual slavery and human trafficking statement. This will allow us to share our efforts against slavery and human trafficking and improve and measure our success each financial year. This past financial year ending 31 August 2024, we took the following key steps to ensure slavery and human trafficking did not occur within our organisation or supply chain.

Slavery and human trafficking policies

Notably, we developed our Slavery and Human Trafficking Policy, which can be found alongside our CSR Policy. We also updated our Supplier Code of Conduct. It sets out clear objectives for 1-, 3- and 5-year slavery and human trafficking plans around the following themes:

• Relationships: Strengthening our supplier engagement process

• Feedback: Establishing grievance mechanisms and channels for individual worker feedback

• Knowledge: Improving our knowledge base by collecting relevant data and improving product traceability

• Third party engagement: Building strategic alliances with independent auditors.

• Measurable change: Developing verifiable KPIs to measure progress

• Supplier collaboration: Encouraging suppliers to collaborate to address slavery and human trafficking issues

• Incentivisation: Developing mechanisms to incentivise employees and suppliers to address slavery and human trafficking and improve labour standards

• Accountability: Establishing a framework for organisation accountability to allow for raising issues, making suggestions, voicing grievances and reporting slavery and human trafficking.

Due diligence procedures

We understand that our biggest exposure to Modern Slavery is in our product supply chains, where we have undertaken activity over the last decade to minimise the risk of Modern Slavery. Within these areas, new suppliers /sites are subject to due diligence checks in the form of ethical/compliance audits. Such audits are also regularly conducted for existing suppliers and sites. These audits assess compliance with Principles and are, amongst other things, intended to identify any Modern Slavery practices. If issues are identified, appropriate investigative and remedial actions will be taken.

Identifying, assessing, and managing risk

We set out to identify the extent of any slavery and human trafficking in our supply chains by:

• Conducting internal spot-checks at sites

• Engaging third party auditors to conduct audits

• Interviewing workers to discuss their conditions and their rights

• Collaborating with our suppliers to develop an improvement plan to address new and previously identified slavery and human trafficking issues

• Instituting an annual review questionnaire for existing suppliers to understand suppliers' self-assessment of slavery and human trafficking issues, allowing us to better identify slavery and human trafficking issues as they develop over time and to collect supplier-provided data to track improvement in suppliers' attitudes.

Key performance indicators

In order to assess the effectiveness of our modern slavery measures we will be reviewing the following key performance indicators:

• Staff training levels

• Number of slavery incidents reported in the supply chain

Training available to staff

To ensure a good understanding of the risks of modern slavery and human trafficking in our business detailed below are some of the training programs we have in place to enable our employees to identify and report any potential breaches of the company's anti-slavery and human trafficking policies.

• Company policy, procedures are available on our company network.

• Discussions at our Production meetings

• Training to all senior employees on the act, its requirements and support available.

- The company require all staff to complete a training course.

The Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated, as necessary. The Board of Directors endorses this policy statement and is fully committed to its implementation.

Name: Mr Sean Masterson

Signature:

For and on behalf of the Board of Directors

Date: 3rd January 2025