
Annual Modern Slavery Statement

This statement is made pursuant to Section 54, part 6 of the Modern Slavery Act 2015 and sets out the steps Sharkey has taken to address the potential for slavery and human trafficking taking place in our business or supply chain.

INTRODUCTION

We recognise modern slavery, as set out in the Act, and seek to do our part to remove such practices in the construction industry. Sharkey shall never engage with an organisation that does not comply with the Modern Slavery Act. All Sharkey Employees are paid above the real living wage. We comply with local minimum age laws and do not employ child labour.

We refer to our policy on Modern Slavery, Human Trafficking and Exploitation in our management system, and this statement is available for all to read on SIMOn and is provided to clients or potential clients on request.

OUR BUSINESS

George Sharkey and Sons Ltd, trading as Sharkey is a Principal Contractor in the UK Construction Industry. Our operations are exclusively within mainland UK, and mostly within the central Scotland. We work in both the Private and Public Sector delivering for Education, Hotel and Leisure, Commercial Office, and Healthcare services.

Our business is an SME and employs approximately 73 employees.

OUR SUPPLY CHAIN

We identify and address potential modern slavery situations. Although we are confident in our internal business practices, the construction supply chain can be complex, often with many tiers of suppliers between main contractor and the source of raw materials. We have adopted various means to clearly communicate our expectations around human rights and modern slavery to our suppliers.

These include:

- Prequalification processes. Any potential supply chain member who wishes to be an 'approved' partner undergoes a rigorous pre-qualification procedure. This procedure has been updated to include questions around the supplier's policies and procedures concerning human trafficking and modern slavery.
- Commercial agreements. We have updated our commercial agreements with our supply chain to highlight and require compliance with the Act.
- Contractual Agreement for Subcontractors and Suppliers to work to our Subcontractors and Suppliers Code of Conduct.

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OUR POLICIES AND PROCEDURES ON SLAVERY AND HUMAN TRAFFICKING

Sharkey Code of Conduct and Ethics sets out the behaviours we expect of our people, and promotes our values of The Sharkey Way:

- Do the Right Thing
- Do it the Right Way
- Do it Together
- Do it Better

Compliance with the Sharkey Code of Conduct and Ethics is part of all employees Terms and Conditions, and is supported with key policies and procedures in the Company Handbook:

- QHrP01 Code of Conduct and Ethics
- QP04 Supply Chain Management
- QP05 Subcontractor and Suppliers Code of Conduct
- QHrP05 Anti-Bribery and Corruption Policy
- QHrP06 Modern Slavery Policy
- QHrP08 Corporate Social Responsibility Policy
- QHrP09 Sanctions Policy

Our Subcontractor and Supplier Code of Conduct and Ethics reflects our approach, and as a holder of ISO9001, ISO45001 and ISO14001, our business policies and procedures are subject to regular internal review and external audit.

DUE DILIGENCE FOR SLAVERY AND HUMAN TRAFFICKING

Sharkey recognise our position to limit damage done through slavery and human trafficking. We undertake due diligence through responsible employment practices, and effective subcontractor and supplier screening, onboarding and monitoring.

Our Ethical and Sustainable Procurement Policy is jointly overseen by the Financial Director and the Business Systems and Compliance Director, who hold the objective of mitigating risks of harm due to slavery and human trafficking.

In our recruitment process, we conduct all the necessary checks as outlined in our Right to Work Policy, to ensure all Sharkey employees have right to work in the UK.

Our employees comply with the working time directive. They can opt out of the 48-hour working week, but this is voluntary, and all employees that choose to opt out are encouraged to work no more than 48 hours per week and to take regular breaks.

All Sharkey Employees are paid the real living wage or above. We comply with local minimum age laws and do not employ child labour. All our employees are paid by bank transfer, and we do not allow payment to be made into third party bank accounts thus minimising the risk of forced or compulsory labour.

The nature of our business makes it unlikely we would employ mentally vulnerable adults but if this were the case we would arrange for them to have a dedicated carer and high-level support from the HR team.

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Sharkey employ ethical business practices, and we take the welfare of our employees seriously. We encourage Speak Up culture and urge everyone to speak up when they see possible violations of the Code of Conduct and Ethics, Sharkey policies, and legal and regulatory requirements. Our Whistleblowing Policy allows employees to report wrongdoing, including exploitation, in various forms without detriment to their employment.

Unannounced site audits help identify risks and detect gaps or practices that could lead to modern slavery being able to take place.

RISK ASSESSMENT AND MANAGEMENT

We assess modern slavery risk when we procure goods and services, manage contracts and recruit staff. Our approach prioritises higher-risk areas (for example, labour-intensive services) and considers factors such as the nature of the service, use of subcontractors, and where goods or services may be sourced from outside the UK.

This includes:

- requiring suppliers to comply with applicable laws and our contractual expectations on ethical employment by agreeing to accept our Subcontractor and Supplier Code of Conduct
- seeking assurance (where proportionate) on how suppliers prevent modern slavery in their own operations and supply chains
- using contract management to identify issues early (for example, through performance reviews and escalation routes)
- acting on concerns, including working with suppliers to investigate, requiring corrective action where needed, and considering termination for serious breaches

TRAINING

All Sharkey employees Job Descriptions reference compliance with the Sharkey Code of Conduct and Ethics, and their T&Cs require that they abide by the Company Handbook. All employees have been re-inducted in the past 12 months to accept and understand our Code of Conduct and Ethics and been provided training, and awareness of the Policy and Procedures required to deliver the standards outlined in the Code of Conduct and Ethics.

All employees are trained in operation and awareness of our ISO Management Systems (ISO9001, ISO14001, and ISO45001), which provides the framework for our business confidence to detect and eliminate Modern Slavery in our business and supply chain.

MEASURING EFFECTIVENESS

We will keep our approach under review and, where proportionate, use indicators to understand effectiveness, such as completion of relevant training; evidence of modern slavery considerations in procurement activity; and the number and nature of concerns raised and addressed through our reporting routes.

If a member of staff suspects modern slavery or human trafficking connected with our operations or supply chains, they are encouraged to report it promptly through line management or our complaints routes. We will take concerns seriously, investigate appropriately, and work with relevant partners or authorities where required.

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As an ISO organisation Sharkey has an internal audit team who integrated effectiveness of policy and procedures seeking continual improvements.

In 2026, Sharkey engaged with an External Auditor to examine our employment practices and effectiveness of our measures.

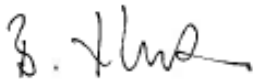
OUR COMMITMENT

Our reputation as an ethical company is one of our most valuable assets. Our Code of Conduct and Ethics clearly sets out our core principles of being a responsible and ethical business, and our commitment to operate with integrity, honesty, and fairness.

Sharkey reject any form of child labour or slavery, including forced labour. We promote a culture of awareness and transparency and encourage our employees to report any suspected wrongdoing.

REVIEW

Sharkey's Modern Slavery Policy will be reviewed annually, or as required due to change in legislation or best practice.



Billy Harrison

Managing Director

Signed on behalf of Company Shareholders

19 June 2026