Modern Slavery Statement

September 2026

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Introduction

This statement is made on behalf of Bridgetown Group Holdings Ltd and its subsidiary companies (together referred to as “the Group”).

Modern slavery is a universal issue affecting businesses in every industry across the world. We are fully aware of the significant risks and challenges posed by modern slavery. The Group is committed to acting with honesty and integrity in all our operations, and there is no place for modern slavery within the Group’s business or supply chain.

Organisation, Structure and Supply Chain

The Group comprises M.V. Kelly Ltd, a civil engineering and groundworks contractor operating throughout the UK, together with a number of subsidiary companies which lease plant, equipment and other assets to M.V. Kelly Ltd. These companies have limited operational activity and direct employees.

As the principal trading entity within the Group, M.V. Kelly Ltd undertakes the Group's operational activities, procurement, subcontractor engagement and supply chain management. Accordingly, the risks associated with modern slavery are primarily linked to M.V. Kelly Ltd's operations and supply chain. The policies, procedures and controls described in this statement are primarily implemented through M.V. Kelly Ltd but apply, where relevant, across the wider Group.

The Group’s supply chain comprises material suppliers, plant hire providers, and subcontractors operating under both labour-only and supply-and-fix arrangements. We also engage professional service providers, including accountants, insurers and consultants. All Group operations are UK-based, and we do not employ seasonal workers. Procurement activities are centrally managed by a dedicated team based at M.V Kelly Ltd’s head office.

Policies

Anti-Slavery Policy

The Group is committed to protecting workers within its business and supply chain from exploitation and has a zero-tolerance approach to slavery and human trafficking. M.V. Kelly Ltd’s Anti-Slavery Policy sets out the Company’s stance on modern slavery and the standards expected of anyone working for or on behalf of M.V Kelly Ltd in any capacity. These standards support the Group’s wider commitment to preventing modern slavery.

Living Wage

M.V. Kelly Ltd is proud to be an accredited Real Living Wage Employer. All directly employed colleagues, with the exception of apprentices, are paid at least the Real Living Wage rate as independently calculated and set by the Living Wage Foundation.
M.V Kelly Ltd’s standard contract terms require subcontractors to pay their own employees and subcontractors the real living wage. This supports the Company’s commitment to fair compensation for workers on its sites that reflect the true cost of living.

Other Policies and Processes

The Group’s Modern Slavery Statement is supported by M.V Kelly Ltd’s additional policies and processes in the following areas:

- Whistleblowing
- Employee Conduct
- Health, Safety and Wellbeing

- Leave and Time Off
- Pay and Benefits
- Recruitment and Selection

These policies and processes are applied across the wider Group where relevant.

Due Diligence and Risk Assessment

The Group recognises that labour-only subcontracting arrangements and extended supply chains present a greater potential risk of labour exploitation than direct employment. These areas remain a focus of M.V Kelly Ltd's due diligence activities.

To mitigate these risks, M.V Kelly Ltd carries out due diligence on suppliers and subcontractors at the point of engagement and throughout the relationship. This includes operational audits on M.V. Kelly Ltd sites and required assurances from its direct suppliers around compliance and transparency in relation to modern slavery.

The Group will not work with suppliers and subcontractors who are unwilling to confirm compliance with the Modern Slavery Act. In addition to the above, M.V Kelly Ltd supports the Group's commitment to reducing the risk of modern slavery by:

- Communicating its Anti-Slavery Policy to all staff, suppliers and subcontractors when entering new or renewed contracts with them.
- Updating employees, clients and subcontractors on the evolving risk of modern slavery through its newsletter.
- Providing regular training to employees and workers.

Measuring Effectiveness

M.V. Kelly Ltd remains low risk and has not identified any modern slavery or human trafficking in the financial year 2025 – 2026 within its business or supply chain. The Company continues to actively monitor and work with suppliers and subcontractors on compliance. These activities support the Group's commitment to preventing modern slavery. M.V. Kelly Ltd's current processes are considered effective; however, we will continue to educate staff about what modern slavery may look like in the UK as the risk, and our understanding, continues to grow.

Training

All new M.V Kelly Ltd employees are trained in the Company's policy and processes as part of their induction. Employees are then required to complete training annually.

Sign Off

This statement has been prepared on behalf of Bridgetown Holdings Group and its subsidiaries in accordance with the Modern Slavery Act 2015 and constitutes the Group's modern slavery statement for the financial year ending 31st May 2026. It was approved by the Board of Directors on 9th September 2026 and signed by the Chief Executive Officer on behalf of the Board on the same day.

For and on behalf of the Board of Directors:
Name & Position: Kelly Linnett CEO
Date: 9th September 2026