Modern Slavery and Human Trafficking Statement 2026

Introduction

At SAMT, we recognise our responsibility to combat modern slavery and human trafficking. This statement sets out the steps we have taken during the financial year 1 January to 31 December 2025, and those we will take, to ensure these practices do not occur in our business or supply chains.

Our turnover for 2025 was £22,052,268, below the £36 million threshold in section 54 of the Modern Slavery Act 2015, so we publish this statement voluntarily. It is structured around the six reporting areas of the Home Office statutory guidance 'Transparency in Supply Chains' (updated March 2025), and our approach is informed by the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance.

1. Organisation, Structure and Supply Chains

SAMT Rebar Ltd is the UK subsidiary of a French parent group, supplying and installing steel reinforcement on major UK infrastructure projects, including the HS2 programme.

During the reporting period SAMT directly employed one person; our site workforce is engaged through two labour-only contractors - MGB Contractors and TAG Construction - who appoint operatives under CIS (Construction Industry Scheme) contracts. Steel reinforcement is sourced from three suppliers - Presider, Armaturis and Hy-Ten - all supplying CARES-approved reinforcement supported by EPDs and responsible sourcing certifications. Plant and equipment hire completes our Tier 1 supply chain, and we maintain a supply chain map with Tier 2 visibility through contractor disclosures and mill certifications.

2. Policies

Our Modern Slavery Policy & Procedure (QMS-PO-007) requires that, throughout our business and supply chain: all applicable laws are complied with; no worker pays recruitment fees; no identity documents are withheld; all workers are paid at least the National Minimum/Living Wage into their own bank account with no unlawful deductions; workers are free to terminate employment, enjoy freedom of movement and association, and face no compulsory overtime; and every worker has access to our grievance and whistleblowing routes, with protection from detriment, a 48-hour acknowledgement and a 7-day initial investigation commitment.

Supporting policies include Whistleblowing, Right to Work, Supply Chain Compliance and Minimum Standards, Anti Bribery & Corruption, and Equality, Diversity & Inclusion. Adherence is a condition of doing business with SAMT.

3. Due Diligence

Due diligence operates in layers: a Supply Chain PQQ (including a modern slavery section) at onboarding; modern slavery clauses in template contracts; right to work share-code and document checks completed during induction, before operatives start work on site, with follow-up checks before any expiry; annual modern slavery compliance statements and questionnaires from our labour contractors (TAG Construction's 2025 compliance pack, including its modern slavery policy and right to work evidence, is held on file, with the same required of MGB Contractors); annual approved-list and contract sample reviews with reserved audit rights; and an annual review of our own purchasing practices (payment terms, lead times and pricing pressure) so our commercial behaviour does not create exploitation risk.

4. Risk Assessment and Management

We classify suppliers by modern slavery risk: our two labour-only contractors (MGB Contractors and TAG Construction), engaging operatives under CIS contracts, are HIGH risk, reflecting the recognised vulnerability of migrant, temporary and lower-skilled construction workers; our three CARES-approved steel suppliers (Presider, Armaturis and Hy-Ten) are LOW risk; plant hire and services are LOW-MEDIUM.

High-risk contractors receive enhanced controls: full PQQ, contract clauses, right to work verification at induction, annual compliance statements and questionnaires, audit sampling and training of their supervision. Where non-conformity is found, we investigate under our Non Conformity Procedure and agree corrective actions; cooperative suppliers are supported to remediate rather than automatically delisted, while serious or uncooperative failures lead to suspension or removal from our approved list.

Risks are recorded in our Business Risk and Opportunity Register, escalated to the Director, and reviewed at the annual Management Review. The Director is accountable for this statement; day-to-day follow-up is managed by C2C Group.

5. Effectiveness (Key Performance Indicators)

We measure effectiveness through five KPIs, reviewed annually by senior management at Management Review. Performance for the reporting year (FY2025) is set out below; all targets were achieved.

KPI	Target	FY2025 Result	Status
Workforce (direct employee and subcontracted supervision) completing modern slavery awareness training / annual toolbox talk	100%	100% – all inducted operatives and supervision briefed; recorded on TBT registers and the Training Matrix	Achieved
Active labour contractors with completed PQQ and modern slavery compliance questionnaire	100%	2 of 2 (100%) – MGB Contractors and TAG Construction; TAG 2025 compliance pack held on file	Achieved
Right to work checks completed at induction before starting on site, and follow-up checks before any expiry	100%	100% – no operative started on site without a completed check	Achieved
Labour contractor agreements reviewed against the annual programme	All planned	2 of 2 contractor agreements reviewed (100% of programme)	Achieved
Modern slavery / whistleblowing concerns raised and closed out with feedback to the reporter	100% closed out	0 concerns raised in FY2025; reporting channels promoted at every induction and toolbox talk	Achieved

We treat the absence of reported cases with caution rather than complacency: reporting routes are actively promoted, right to work checks are verified at every induction, and contractor compliance evidence is reviewed annually, so that concerns are identified rather than assumed absent.

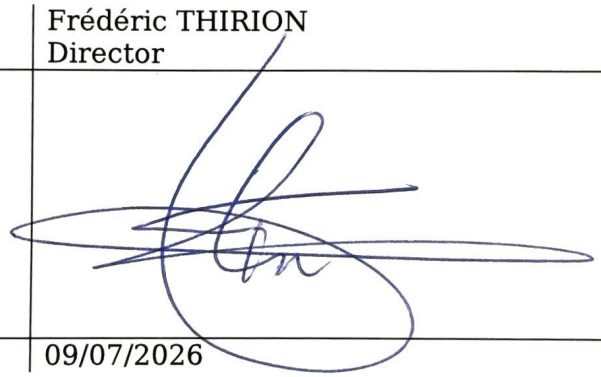
6. Training

All new starters, including subcontracted and agency operatives, receive modern slavery awareness at induction. All site operatives and supervision receive an annual modern slavery toolbox talk covering the ILO's 11 indicators of forced labour, signs of exploitation, unethical recruitment red flags and how to report concerns; managers and office staff receive annual awareness training.

Attendance is recorded on toolbox talk registers and tracked in the Training Matrix, with 100% completion as a KPI. Materials are made available in the main languages of our workforce. In FY2025, 100% attendance was recorded across inductions and toolbox talks.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes SAMT's modern slavery and human trafficking statement for the financial year ending 31 December 2025. It has been approved by the board and signed by Frédéric Thirion, Director. It will be published on our website and the UK Government Modern Slavery Statement Registry, and we will build on our disclosures year on year.

Authorised By:	Frédéric THIRION Director
Signed:	
Date:	09/07/2026