

# Modern slavery statement

2025

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# A message from our Chief Executive Officer

At Tilbury Douglas, we recognise that modern slavery and labour exploitation are serious risks in the construction industry and wider UK economy. As a business delivering projects through a large and diverse supply chain, we understand our responsibility to identify, prevent, mitigate and address these risks across our own operations and our supply chain partners.

The challenge remains significant. Recent insights from anti-slavery charity Unseen show a sharp increase in suspected victims linked to construction activity, reinforcing the need for sustained vigilance, collaboration and transparency.

Over the last year, there has been increasing focus from government, regulators and investors on responsible business conduct and ethical supply chains. For example, updated UK Government guidance under Section 54 of the Modern Slavery Act, new NHS procurement requirements relating to slavery and human trafficking risk and growing international legislative developments such as the EU Forced Labour Regulation and Corporate Sustainability Due Diligence Directive. Together, these developments reflect a clear global direction of travel towards greater transparency, accountability and human rights due diligence.

During the last year, we have continued to strengthen our approach through enhanced supply chain due diligence, labour and supplier audits, improved supply chain mapping and alignment with our wider ESG strategy, Building a Better Future Together. We continue to align our approach with the principles of "Find it, Fix it and Prevent it" and with evolving UK and international best practice.

No single organisation can address these risks alone. Meaningful progress relies on collaboration between clients, contractors, suppliers, industry bodies, government and charities. We are committed to playing our part in raising standards across the sector and working with organisations that share our values and commitment to ethical business practices.

This statement sets out the actions taken by the Tilbury Douglas Group during the last financial year to identify, manage and mitigate the risks of modern slavery and human trafficking within our operations and supply chain, and our commitment to continuous improvement.

**Craig Tatton**  
Chief Executive Officer

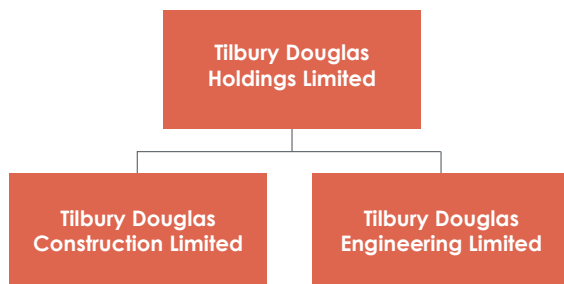


## 1. Structure and operations

In 2025 Tilbury Douglas celebrated its 142nd year of trading. Having been part of Interserve Group from 2001 to 2022, Tilbury Douglas once again became independent in May 2022 when the shareholdings of its operating companies, Tilbury Douglas Construction Limited and Tilbury Douglas Engineering Limited, were acquired from Interserve Group.

Tilbury Douglas Group consists of parent company Tilbury Douglas Holdings Limited and two operating companies, Tilbury Douglas Construction Limited (company number 00303359) and Tilbury Douglas Engineering Limited (company number 03044398).

### Tilbury Douglas Group structure



The Group's customer base is primarily concentrated in government and regulated sectors that are critical to the long-term success and resilience of the UK, including health, education, water, defence, justice and the civic and civil estate. The Group is recognised for building long-term, collaborative relationships with customers and suppliers, underpinned by disciplined delivery, effective governance and a consistent focus on creating mutual value.

## 2025 Group highlights

**£691.6m**  
Group revenue

**£1.5bn**  
Group order book

**1,268**  
Number of employees

**80%**  
Spend with SMEs

**60%**  
Spend with local suppliers

**£469m**  
Social value return

Our regional offices are strategically placed across the UK to support all our operations.

### Regional Building offices

| Region                 | Office locations      |
|------------------------|-----------------------|
| Scotland               | Livingston            |
| Yorkshire & North East | Castleford, Stockton  |
| North West             | Wigan, Salford        |
| Midlands               | Birmingham, Coalville |
| South Wales            | Swansea               |
| South West             | Bristol, Exeter       |
| South East             | London, Southampton   |



## Tilbury Douglas service lines

### Regional Building & Fit-Out

Regional Building & Fit-Out generated revenue of £509.4m in 2025, up from £455.1m in 2024.

#### Regional Building

Regional Building is the Group's largest service line and a leading contractor across the health, education, justice, civic and defence sectors. Through its established regional office network, the business continues to secure and successfully deliver projects for long-term public sector and regulated clients critical to the UK's infrastructure.

Focused on core sectors, geographies, and framework opportunities, the business combines experienced regional teams, strong governance, and trusted supply chains to deliver reliable performance and sustainable profitability. Future growth will continue through national and regional frameworks, alongside selective expansion into complementary markets.

#### Fit-Out

Fit-Out delivers fast-track Cat A and Cat B fit-out and refurbishment projects across both public and private sectors.

Our comprehensive offering encompasses an integrated design, procurement, fit-out and aftercare service on large-scale or bespoke projects.

### Engineering

With revenues in 2025 £110.6m, up from £101.0m in the prior year, Tilbury Douglas Engineering is a

leading mechanical and electrical contractor, offering highly effective solutions throughout the United Kingdom. It is well known as a principal contractor or specialist supply chain partner. In addition to delivering independently to its external customers, Engineering also undertakes works with the Group's Regional Building service line, providing an "all-inclusive" offering to customers as part of our Integrated Working Model. This offering is a key differentiator driving efficiencies and mitigating customer risk across multi-sector frameworks.

### Infrastructure

Infrastructure line is fully focused on the water sector, with main customers Thames Water, South-West Water and Yorkshire Water. Revenue of £71.6m was a £6m improvement in 2024. The business is also strengthening its regional support model, enhancing its ability to serve its framework customers consistently. This supports closer collaboration, improved delivery resilience and a more effective contribution to the ongoing investment required to maintain and enhance the UK's water infrastructure.

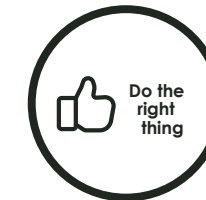
### Our strategy

Our strategy is to develop trusted, long-term relationships with customers at both national and regional levels. This approach enables us to deliver projects with greater reliability, unlock opportunities for innovation, strengthen governance and build cohesive regional teams and supply chains.

We focus on our core sectors, geographies, customers, and frameworks within our Regional Building, Fit-Out, Engineering and Infrastructure service lines. We deliver this strategy through

our values, which underpin everything we do, alongside a dedicated focus on our strategic priorities and our proven business model.

### Our values



*We act with integrity: legally, morally and ethically. We prioritise safety and sustainability, taking responsibility to improve or protect what matters.*



*By exploring ideas and working collaboratively, we deliver better outcomes for our customers, our people and our*



*We listen, encourage openness and value different perspectives to build stronger teams, better ideas and inclusive outcomes.*



*We take pride in the quality and care we bring to everything we do, recognising the impact our contributions make. We take ownership, pay attention to detail and celebrate work well done.*

Our commitment to addressing modern slavery and human rights is a direct reflection of these values. By fostering an environment where people feel able to speak up and by holding ourselves to doing the right thing, we are better equipped to identify risks, challenge poor practices and drive meaningful improvements across our operations and supply chains.

## 2. Supply chain

In 2025, we utilised the services of 3,126 supply chain partners across our service Lines. This was across a broad range of categories, typically segmented by Subcontract (66%), Labour agency (<1%), Services (16%), Products and materials (15%) and Plant (3%).

In 2025 99.5% of our tier 1 suppliers were UK based, with 14 being outside the UK in areas such as Ireland, Netherlands, and the US. The top subcontract trade by spend where \* denotes trades we categorised as high risk of modern slavery.

| Trade                   | % of 2025 subcontract spend |
|-------------------------|-----------------------------|
| M&E                     | 33%                         |
| Groundworks*            | 10%                         |
| Drylining*              | 5%                          |
| Roofing*                | 3%                          |
| General building works* | 3%                          |
| Structural team         | 1%                          |
| Cladding                | 1%                          |
| Glazing                 | 1%                          |
| Scaffolding*            | 1%                          |
| SFS                     | 1%                          |
| Flooring                | 1%                          |
| Bricklaying             | 1%                          |

Of the 12,500 operatives present on Tilbury Douglas sites in 2025, 85% were from the supply chain. Over 50% of the supply chain operatives worked in M&E, general labouring, groundworks, dry lining, scaffolding, fixing, joinery, roofing, bricklaying, cladding, or fit-out.

In our most recent supply chain mapping exercise carried out on our Department for Education projects, we identified almost 500 tier 1 suppliers and over 325 tier 2 which is a 10% increase on 2025 and we intend to improve supply chain mapping processes throughout 2026, to identify more tier 3s, and what safeguards they have in place, such as modern slavery statements and policies.

Our Group Supply Chain Strategy, Strong Regional Relationships focuses on our long-term partnerships withing our regional businesses, ensuring each region has preferred subcontractor frameworks in key trades. This maintains stability, consistent delivery and ensures that standards are met.

## 3. Governance and oversight

Building on our structure, operations and supply chain profile outlined above, oversight of modern slavery and human rights risks sits within our wider governance framework, with accountability at Board, Executive and Operational levels.

### Board oversight

Our Board of Directors has overall responsibility for oversight of modern slavery and human rights. The Board approves our Modern Slavery Statement and related policies and reviews the effectiveness of our systems and controls to identify and manage modern slavery risks. Modern slavery is a principal risk on our Board's risk register, reflecting our primary exposure through our supply chain and is reviewed quarterly.

### Executive oversight

In 2025 as part of the launch of our ESG

strategy "Building a better future together," an ESG Committee was set-up, including Board level sponsorship and relevant executive directors. This Committee meets quarterly and reviews modern slavery and human rights risk as a standing agenda item, including progress against actions, emerging risks, and any escalations requiring executive attention.

### Operational and senior leadership monitoring

At an operational level, the risk assessment, key developments, and associated mitigating actions are reviewed monthly by the Procurement Senior Leadership Team and reported monthly to the Holdings Board. In addition, a consolidated quarterly summary report is provided through established Group reporting mechanisms to support oversight and escalation.

Our Procurement and Supply Chain Director is accountable for developing and implementing our approach to managing modern slavery risk. This includes oversight of supplier due diligence, audit activity, engagement with higher-risk suppliers, and escalation of identified issues where required.

Responsibility for implementing our approach is shared across the business. Managers across our divisions and business units are responsible for promoting awareness of modern slavery risks and mitigations, ensuring relevant training is completed, and implementing relevant policies and procedures. This includes procurement, project delivery, site management, and people-related functions, reflecting that modern slavery risks exist beyond direct procurement activity.

During the reporting period, issues and insights arising from our governance reviews



informed procurement and due diligence activity in higher-risk areas, supporting targeted action and continuous improvement in our risk management approach.

## 4. Relevant policies

Our commitment to tackling modern slavery and human rights is underpinned by our Group policies, which set our expectations for responsible business conduct across our operations, supply chain and business relationships. We keep these policies and related processes under review to support continual improvement.



Our policies are informed by legal requirements, evolving best practice and internationally recognised standards, including the UN Guiding Principles on Business and Human Rights (UNGPs). They help guide our approach to preventing, identifying, managing and mitigating modern slavery and human rights risks.

These policies apply to everyone working for us or on our behalf (including employees, agency workers, contractors, consultants, suppliers and business partners), and where relevant we expect our suppliers to cascade appropriate standards through their own supply chains. They inform our business processes, joint ventures, procurement activities, contractual arrangements, and they support our response to concerns and access to remedy.

### Core policies ([View on our website](#))

#### Whistleblowing

Provides a safe and confidential route for our employees and other relevant parties, including customers and workers in our supply chain, to raise concerns about suspected modern slavery or labour exploitation through our external 'Speak up' platform, delivered by Navex.

Our Whistleblowing policy is reviewed annually by our General Counsel and Executive Director and was last reviewed in May 2026.

In the reporting period we communicated it through inductions, posters across our sites and offices, screensavers, our intranet/hub, subcontractor onboarding materials, supplier communications, and in mandatory training for all employees, including clear messaging that people can report anonymously and without fear of retaliation. It is also referenced in related policies, including safeguarding, anti-slavery and

human rights and bribery and corruption.

#### Anti-slavery and human rights

Sets out our commitment to preventing, mitigating and managing the risks of modern slavery, forced labour and human trafficking across our business and supply chain. We expect our employees, contractors, suppliers and business partners to act ethically, comply with applicable law and uphold internationally recognised human rights standards such as UNGPs and ILO Declaration on Fundamental Principles and Rights at Work.

The policy supports transparency, due diligence, reporting and continuous improvement. It describes our approach where concerns or breaches are identified, including escalation routes. It also sets out how we may support access to remedy, including victim support and actions to address issues and prevent recurrence. The policy also reinforces our commitment to responsible recruitment, where no worker should pay for a job, in line with the Employer Pays Principle.

Our Anti-slavery and human rights policy is reviewed annually by our Procurement and Supply Chain Director and approved by our General Counsel. It was last updated in April 2026.

The policy is publicly available on our website. We have communicated it through relevant internal and external channels including induction, mandatory training, procurement processes and supplier relationship management. It is also referenced in related policies including those listed in this statement.

## Other relevant policies

The below policies are publicly available on our [website](#) and form part of our subcontract documentation.

### Conducting business with Tilbury Douglas

Sets out the standards of ethical behaviour and integrity expected of employees, business partners and others working on our behalf. It reinforces our commitment to ethical trading and compliance with the law across our operations and supply chain, including a clear prohibition of slavery, servitude, forced labour and human trafficking.

The policy is supported by a wider framework of related policies, including Anti-Slavery and Whistleblowing policies, and is designed to prevent wrongdoing and support responsible business conduct.

It also emphasises the importance of speaking up, requiring employees and third parties to report concerns and providing access to the whistleblowing helpline.

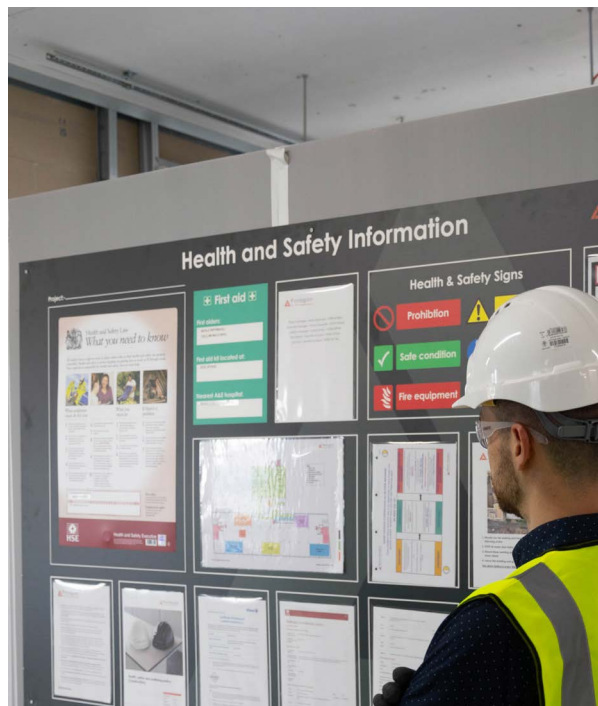
Our Conducting business with Tilbury Douglas policy is reviewed annually by our Procurement and Supply Chain Director and approved by our Board of Directors.

### Health, safety and wellbeing

Sets out our commitment to providing a safe and healthy working environment for employees, contractors and others affected by our activities. It establishes standards to manage health and safety risks and promote physical and mental wellbeing across our operations and sites. By supporting safe working conditions and worker wellbeing, the policy also helps to reduce vulnerability to exploitation. Further detail on the

policy's evolution over the last year, and the rationale for those changes, is set out in Section 8.

Our Health, safety and wellbeing policy is reviewed annually by our Health, Safety and Wellbeing Director and is approved by our Board of Directors.



### Sustainable procurement

Sets out our responsible procurement approach, aligned with ISO 20400 and our Modern slavery policy. It commits to ethical, human rights and labour standards, fair contract terms, responsible sourcing, and improved traceability and transparency across the supply chain to help identify, manage and reduce modern slavery risks.

Our Sustainable procurement policy is reviewed annually by our Procurement and Supply Chain Director and is approved by the Board.

### Diversity and inclusion

Sets out our commitment to a fair, inclusive and respectful workplace where people are treated with dignity and given equal opportunity. By promoting respect, inclusion and awareness of one another, it helps create an environment where concerns about wellbeing, harm or exploitation are more likely to be noticed and raised.

Our Diversity and inclusion policy is reviewed annually by our Human Resources Director and is approved by the Board.

## 5. Assessment of the risk

### Operations and supply chain

#### Risk identification and assessment methodology

We use a range of criteria to identify and assess the risks of modern slavery and labour exploitation across our operations and supply chain. This assessment covers suppliers of goods and materials, service providers, subcontractors and providers of contract and agency labour. We consider factors including the category of goods or services supplied, geographic location, labour provision models, workforce characteristics and the complexity and transparency of supply chain tiers. Our approach is intended to support a proportionate, risk-based understanding of where workers may be most vulnerable to exploitation, and where enhanced due diligence may be required.

A combination of internal and external sources informs our assessment, including desk-based research; client/procurement/delivery stakeholders; due diligence and supplier relationship management activity; worker feedback; audit findings; and external intelligence. This includes engagement with industry groups and specialist organisations such as the Supply Chain Sustainability School's Built Environment Against Slavery Group, Achilles Ethical Site Audits, the GLAA, Unseen, and the Global Slavery Index. Our ongoing on-site audit programme has informed and refined our risk assessment, identifying the UK geographies and trades most likely to present elevated risks. This has enabled us to focus our efforts on higher-risk trades and projects, particularly those operating in geographical areas identified as higher risk through our due diligence and risk assessment activities.

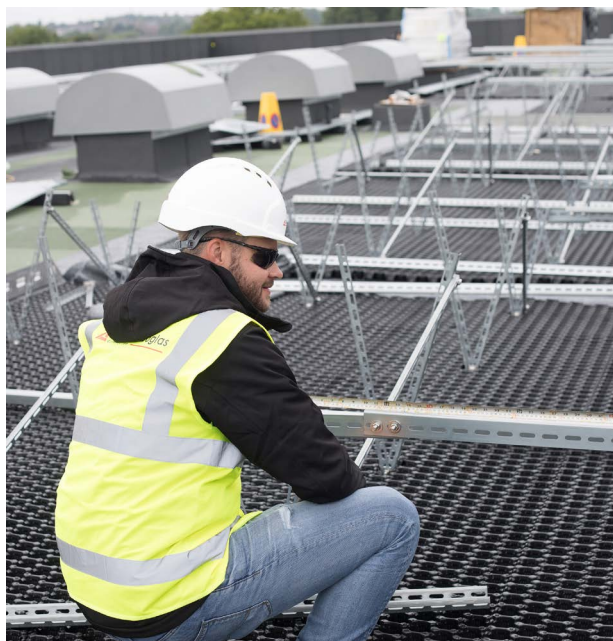
**Supply chain category/trade.** We considered where commercial pressures, subcontracting models and labour practices may increase the risks. Factors included price-driven contracting, supply chain disruption, volatility in costs, and labour shortages, all of which can increase vulnerability and the risk of exploitation.

**Geography.** Although our work is UK based and UK sourced, we assessed whether materials, products or services may involve complex international supply chains with heightened risk. We used resources such as the Global Slavery Index 2023, Design for Freedom's International Toolkit, and the List of Goods Produced by Forced Labour or Child Labour to help inform where the most salient risks may lie.

**Labour provision.** We identified areas with a prevalence of low-skilled or low-paid workers, skills shortage and higher use of migrant labour,

all of which can increase the risk of exploitation. We considered the practical challenges of ensuring that the documentary evidence demonstrating compliance and capability is in place for all workers. We recognise that wider economic pressures, including the rising cost of living, may further increase worker vulnerability in some sectors.

**Complex supply chain tiers.** We assessed where there is limited visibility beyond the first-tier subcontractor, and where work is subcontracted further down the tiers. We considered the range of routes into work (direct employment, temporary labour, subcontractors and sub-subcontractors) and the extent to which controls can be applied consistently at lower tiers. We recognise that achieving visibility beyond lower tier supply chains remains a challenge across the construction sector and that our approach in this area continues to evolve.



## Key risks identified

We identified our most salient modern slavery and labour exploitation risks in labour intensive, subcontracted and time-sensitive activities where workforce attrition is high, where there is a prevalence of low-skilled or low-paid labour and where work is often short-term/transient. These conditions can increase vulnerability to exploitation, particularly where there is limited visibility across supply chain tiers and reliance on temporary or agency labour.

On this basis, we have prioritised subcontracted trades including concrete pouring, scaffolding, demolition, drylining, builders' clean, security, groundworks, civils and general labour, alongside indirect services such as waste management.

We have also prioritised product categories including PV cells, aggregates, bricks, PPE and consumables. These often rely on complex international supply chains, where visibility beyond the first tier of suppliers can be limited, and oversight of labour conditions may be weaker. Their global sourcing profiles can increase exposure to modern slavery and labour exploitation risks, particularly where raw materials, components or processing take place in higher-risk geographies or through multiple intermediaries. See section 11 for the case study on solar PV.

The outputs from the risk assessment process informed prioritisation of audits, supplier engagement and due diligence activity during the reporting period, with resources focused on those areas assessed as presenting the most salient risks.



## Downstream

With over 90% of our business delivered through long-term public sector frameworks in education, healthcare, justice, defence and water, we do not consider there to be a high risk within our customer activities.

However, we recognise that collaboration is essential, and we continue to support customer-led and industry-wide initiatives that improve awareness, due diligence and continuous improvement in relation to modern slavery risks within UK construction. For example, our support for the CCLA Investment Management Modern Slavery CEO Roundtable in collaboration with Supply Chain Sustainability School and Cabinet Office, and the School SME roadshow in collaboration with the Department for Education.

## 6. Due diligence: direct workforce

As our direct workforce is composed primarily of graduate, apprentice and skilled professional roles, we assess the inherent risk of modern slavery in direct employment as relatively low compared to our supply chain exposure. However, we recognise that risks can still exist in all employment contexts.

Through our onboarding processes, we undertake right to work checks for all new starters to confirm their eligibility to work in the UK. In addition, we engage a third-party vetting organisation to undertake BPSS screening, including identity verification, employment history checks, reference checks and basic criminal record checks where appropriate to the role. These processes are designed to support responsible recruitment practices and

help reduce the risk of fraudulent or exploitative labour arrangements.

Tilbury Douglas does not permit recruitment fees to be charged to workers and expects labour providers and recruitment partners to operate in line with the Employer Pays Principle. We are committed to ensuring that recruitment practices are ethical, transparent and do not create situations that could increase worker vulnerability.

Employees involved in recruitment receive training on identifying potential indicators of modern slavery and the appropriate escalation routes for concerns. As outlined in the 'training and awareness' section, our induction programme also emphasises whistleblowing procedures and the importance of due diligence in identifying and mitigating modern slavery risks.



All employees receive a written contract setting out their terms and conditions of employment and are required to complete training on key policies, including whistleblowing, anti-slavery and human rights. Employee engagement initiatives, including our Your Voice survey and other workforce feedback mechanisms, provide additional routes for identifying concerns relating to wellbeing, vulnerability or potential exploitation. These channels support open communication and enable concerns to be raised and addressed appropriately.

Where there is a requirement to recruit temporary white-collar staff, we use a limited number of strategic labour partners. We undertake due diligence and periodic audits of these providers to assess compliance with employment legislation and our modern slavery requirements. These audits are conducted annually and are designed to identify potential risks of labour exploitation by assessing governance arrangements, recruitment practices and risks within the provider's own supply chain.

Labour providers are required to confirm that workers retain possession of their own identity documents and that no deductions, deposits or recruitment fees have been imposed as a condition of employment. Audits are tailored to the individual provider but, as a minimum, include a review of onboarding processes, right to work checks, supply chain due diligence assessments, relevant policies and procedures and internal governance mechanisms. Where gaps or areas for improvement are identified, corrective actions are agreed with the provider and progress is monitored through ongoing engagement.

To monitor the effectiveness of our direct workforce due diligence activities, we track a range of indicators including recruitment agency audit outcomes, completion rates for recruitment and modern slavery training by relevant managers and recruiters, completion of onboarding compliance checks, and completion rates for enhanced modern slavery and safeguarding training amongst people managers, recruiters and HR professionals.

These measures provide oversight of our controls, support continuous improvement in our approach to preventing modern slavery risks within our workforce, and help ensure that those with workforce responsibilities have the knowledge and confidence to identify, escalate and respond appropriately to potential indicators of exploitation.

## 7. Due diligence: onboarding and site access controls

During the reporting period, we continued to use Datascope, our digital site access and onboarding system, to record key information for everyone entering our sites. This includes right to work checks, identity verification, contact details, emergency contacts, accreditations, competencies and clarity on individuals' employers.

Over the last year, we expanded the use of Datascope on Department for Education projects to include use by tier 2 and tier 3 contractors. As a result, 83% of our sites are now live on Datascope, supporting greater consistency in workforce onboarding processes and improved visibility of who is working across our project sites and supply chain. During the reporting period, 12,507 operatives were



registered through Datascope across 87 sites.

Datascope also supports a more risk-based approach to worker oversight by enabling our information managers to review workforce information and identify patterns or red flags that may warrant further review. For example, where multiple individuals are linked to the same address or emergency contact details, suggesting potential labour exploitation risks.

During the reporting period, we began trialling how this functionality could be applied more consistently across projects and supply chain tiers to support proportionate monitoring and escalation processes. We recognise that our use of workforce data and digital systems in this area is continuing to develop and forms part of our broader approach to strengthening due diligence and risk identification.

## 8. Due diligence: enhancing worker wellbeing and safeguarding

During the reporting period, we strengthened the connection between our Health, Safety & Wellbeing (HSW) approach and our efforts to prevent labour exploitation. We recognise that poor working conditions, fatigue and limited worker voice can increase vulnerability to exploitation and reduce the likelihood of concerns being raised.

### What changed

Following feedback received through our 2025 Your Voice survey, where wellbeing emerged as a key theme, we updated our HSW policy and framework to place greater emphasis on worker wellbeing, psychological safety, and speaking up. Enhancements included:

- Introduction of Changing the Conversation behavioural change programme and the Cultural Calculator feedback tool.
- Clearer wellbeing provisions within site standards (including fatigue management, mental health, and access to welfare facilities)
- Stronger integration between HSW inductions and the Whistleblowing policy, making it clearer how workers, including subcontractors, can raise concerns safely and confidentially.
- More visible and accessible reporting routes on site, including use of posters, briefings and QR codes were used, alongside prompts relating to indicators of exploitation.
- Increased focus on supervisor capability to recognise signs of vulnerability or exploitation and respond appropriately.



## changing the conversation

### Why it changed

These enhancements were informed by:

- Feedback from workforce engagement initiatives indicating that some operatives were unsure how to raise concerns confidentially.
- Industry learning highlighting the links between wellbeing, fatigue, and mental health and heightened vulnerability to exploitation.
- Collaboration and best practice sharing through industry groups, reinforcing the importance of embedding safeguarding considerations within HSW processes.

### Impact

These updates have helped create a more preventative and people-centred HSW culture, with clearer links between wellbeing, safeguarding and vulnerability to exploitation. In practice this has supported:

- Increased awareness of wellbeing and welfare indicators that may signal vulnerability.
- Earlier identification and escalation of concerns through routine HSW engagement activities.
- More accessible reporting routes and improved supervisor confidence in responding to concerns appropriately.



## 9. Due diligence: supply chain

We work with Constructionline (an independent assessment provider) to run our supply chain prequalification process against the Build UK Common Assessment Standard (CAS). As part of onboarding, all suppliers must complete the CAS Corporate and Professional Standing questions, which include checks on areas such as whistleblowing arrangements, modern slavery and human trafficking controls, and minimum standards for working conditions. For suppliers with turnover above £36 million, a copy of their modern slavery statement is requested, which Constructionline reviews as part of the CAS verification process. This provides a consistent baseline level of due diligence across our supply chain.

Our procurement and tendering processes include standardised subcontract terms and conditions, which incorporate requirements relating to modern slavery, ethical conduct and wider compliance obligations. These form part of our baseline contractual controls applied across projects. We recognise that these standard terms are broadly applied and are not currently differentiated by specific



trade or package-level modern slavery risk. We are developing our approach to better reflect varying levels of risk across different categories of work and to strengthen risk-based application within procurement practices.

Within the procurement function, an initial modern slavery risk matrix was developed two years ago to support identification of risk across trade packages. This is currently being refreshed to improve alignment with current supply chain risks and to better support risk-based decision making across procurement activity. Tender evaluations are primarily undertaken by commercial and design teams, supported by colleagues with baseline modern slavery awareness training. Following evaluation, contractors appointed are required to attend post-tender review meetings, which include standard questions covering wellbeing and modern slavery considerations. Any resulting actions are incorporated into contract award documentation and supplier requirements. These discussions help reinforce expectations and support proportionate follow up actions where required.

We recognise that, given the scale and complexity of our operations, with a significant number of live subcontract packages at any one time, identifying and embedding enhanced modern slavery controls at contract level is an area that continues to evolve. We are working to improve visibility and consistency in identifying higher risk packages that may require additional due diligence. Following subcontractor selection and internal approval processes, a range of checks are undertaken, including financial, capability and compliance assessments. While these processes may trigger proportionate mitigation actions where appropriate, modern slavery risk is not yet consistently categorised

within a formal low/medium/high framework at this stage of approval. We are exploring how this could be more systematically embedded within existing approval processes using existing tools and governance structures.

We are aware that commercial and procurement practices in construction can influence working conditions throughout the supply chain. Factors such as unrealistic delivery timescales, late payments, labour shortages and price pressures can increase the risk of labour exploitation and modern slavery. We therefore seek to ensure that our business practices support responsible employment and sustainable supply chain relationships.

This approach is reflected in our Strong Regional Relationships strategy through which we have worked consistently with our regional supply chains, enabling us to communicate our expectations/requirements clearly, promote responsible business practices and maintain open dialogue on labour standards and worker welfare.

Prompt payment is an important part of our approach. During the reporting period, we are proud to say that 99% of all payments to our suppliers were made within 60 days and 97% of all small suppliers were paid within 30 days and we met the silver award in the fair payment code.

A screenshot of a digital interface for Tilbury Douglas Construction Limited. The header shows the company name and a back arrow. Below, there are fields for 'Industry Sector' (Construction), 'Company House No.' (00300359), and 'Area' (Nationwide). On the right, it displays the 'Award Level' as 'Fair Payment Code Silver' with a 'P' icon, and the 'Registration Date' as '14 January 2026'.



At the outset of each project, a procurement strategy is developed to support effective planning and responsible sourcing. This helps minimise the need for short notice, high volume or urgent procurement activities that can place undue pressure on our suppliers and increase the risk of poor labour practices within the supply chain.

Once contracts are awarded, modern slavery obligations are reinforced within subcontract documentation, including requirements for compliance with relevant legislation and expectations that subcontractors cascade appropriate standards through their own supply chains.

Looking ahead, we plan to further strengthen the integration of modern slavery risk assessment into procurement decision-making. This includes enhancing the use of existing risk tools, improving consistency of risk identification across trade packages, and embedding clearer mechanisms to support proportionate escalation where higher-risk indicators are identified.

## 10. Due diligence: Audits

During the reporting period, we strengthened our approach to managing modern slavery risk through targeted, risk-based supply chain audits. Audit activity was prioritised using the risk criteria outlined in Section 5, particularly trade category and geography. Indirect supply areas such as waste management, labour provision and the supply of personal protective equipment (PPE) were identified as higher risk areas due to their reliance on agency labour, subcontracting and multi-tier operating models. We audited five higher-risk suppliers: three in waste and recycling, one labour provider and one PPE

supplier.

To support this work, we appointed an independent third-party audit partner, Mercaston Solutions, which has specialist experience in modern slavery risk mitigation within the construction sector. Audits included both scheduled and unannounced site visits, alongside visits to relevant supply chain partners, to assess how suppliers were identifying and managing modern slavery risks in practice. This represented a shift from a predominantly desktop-based approach towards more in-depth, on the ground testing of operational controls and worker protections.

Audits included confidential worker interviews on site and a review of lower-tier subcontracting arrangements. They examined the effectiveness of suppliers' policies, processes and controls, including governance and accountability, due diligence on subcontractors and labour agencies, right-to-work and pay practices, and worker engagement and grievance mechanisms.

Where risks were assessed to be higher, audits also included additional review of sub-subcontracting arrangements. This provided greater visibility of how suppliers were managing modern slavery risks further down their supply chains and helped identify areas where workers could potentially be exposed to risks such as excessive recruitment fees, contract substitution or barriers to raising concerns.

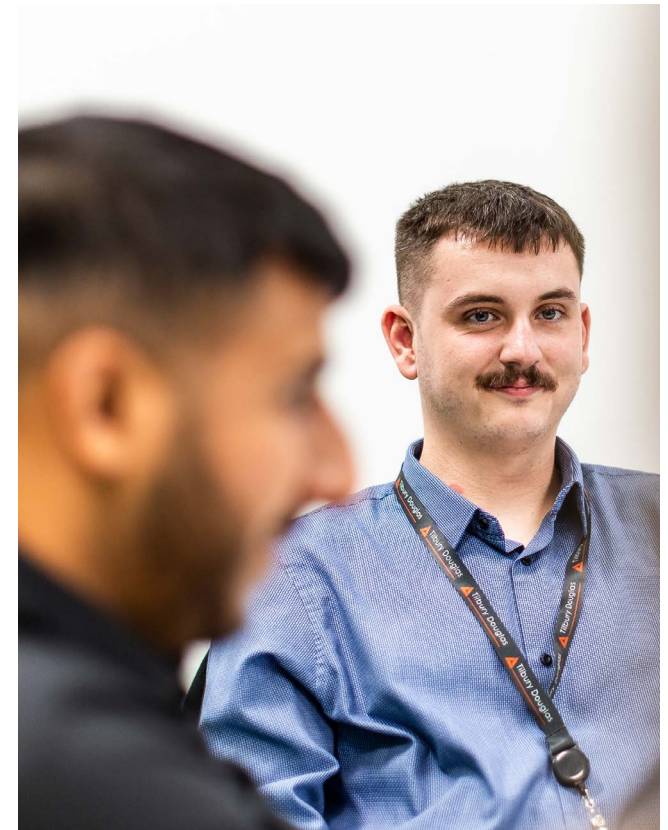
### Findings, actions taken and how our approach has evolved

The audits identified several recurring risk themes, including reduced visibility in multi-tier supply chains, varying levels of maturity in

modern slavery controls, and inconsistent labour specific and worker-centred due diligence.

These findings informed targeted supplier engagement and corrective action plans, including:

- clarifying expectations for modern slavery controls
- requiring improvements in risk mapping and subcontractor oversight where gaps were identified, and
- strengthening worker related safeguards such as agency labour oversight, right-to-work checks and access to grievance mechanisms.



We are continuing to collaborate with the relevant suppliers to monitor and support progress against agreed time-bound actions and will undertake follow up activities to verify implementation.

Drawing on the findings and lessons from these audits, we updated our modern slavery policy and associated supplier requirements to:

- embed clearer expectations relating to subcontractor and labour agency due diligence
- require higher risk suppliers to map and disclose key tiers of their supply chains; and
- reference minimum standards for worker protection, including responsible recruitment practices, such as the Employer Pays Principle, and access to grievance mechanisms.

These updated requirements apply to new and renewed contracts within the higher risk categories identified.

We now treat findings from these audits as a standing input into our annual modern slavery risk review and policy update cycle, supporting continuous improvement in our approach to identifying and mitigating exploitation risks. No instances of modern slavery were identified during the reporting period.

## 11. Due diligence case study: addressing modern slavery risk in solar PV supply chains

Having identified solar PV as a higher risk area, we developed and rolled out a dedicated solar PV Procurement Guidance Note (May 2025). The Guidance Note was informed by recognised good practice, including procurement guidance developed by Action Sustainability and endorsed by Dr Laura Murphy, author of 'In Broad Daylight.'

During the reporting period, the Guidance Note was used to support more strategic procurement decisions and earlier consideration of risk at the outset of the procurement process. We required suppliers and subcontractors to demonstrate supply chain transparency for key components, including country of origin information, audit evidence and alignment with the Modern Slavery Act 2015 and OECD Due Diligence Guidance. Ethical considerations, ESG performance and supply chain traceability were embedded within tender evaluation processes alongside traditional commercial and technical criteria.

Over the year, we identified high-risk materials, components, geographic regions and manufacturers within the solar PV supply chain to inform our decision making and prioritisation of risk. This included upstream raw material extraction and processing, polysilicon production and wafer/cell manufacturing stages, which independent research has highlighted as presenting elevated risks of forced labour and other human rights abuses.

We also strengthened the consistency of our supplier engagement by using standardised questionnaires, checklists and reference requirements, and by promoting recognised external standards, audits and industry bodies where appropriate, including the Microgeneration Certification Scheme (MCS), Solar Stewardship Initiative, Responsible Business Alliance, Solar Energy UK and the Carbon Trust. This improved the robustness of our due diligence and supported more proportionate decision-making where suppliers did not meet our ethical and transparency expectations.



## 12. Training and capacity building

Training and capacity building play a vital role in helping our people and partners understand modern slavery, labour exploitation risks, and respond appropriately. We recognise that tackling modern slavery requires collaboration across our business and supply chain to strengthen awareness, capability and accountability.

Training and awareness activities delivered during the reporting period are summarised below.

### Training for our people (internal)

#### Mandatory compliance e-learning, (including modern slavery module)

All our employees are required to complete a dedicated 20-minute modern slavery e-learning module covering what modern slavery is, why it matters, its prevalence in our sector, the evolving risks, how to spot the signs and how to report concerns.

In 2025, the module was refreshed and achieved a completion rate of 99%.

#### Induction programme

Modern slavery is embedded into our company induction programme for all new starters. This ensures that new employees understand our expectations around ethical labour practices, their responsibility to remain alert to potential risks, and the importance of speaking up early where concerns arise. It also explains how to raise concerns safely and confidentially through Speak Up (as outlined in our Whistleblowing Policy), reinforces that concerns can be raised confidentially and without fear of retaliation, and makes clear that individuals raising

concerns in good faith will not suffer retaliation, detriment or adverse treatment.

#### Enhanced training: Modern Slavery Readiness and Transparency Gaps workshop for senior leadership team

In 2025, Action Sustainability delivered a four-hour, in-person, interactive workshop for Regional Directors and senior functional leaders, including the Procurement and Supply Chain Director, ESG Director, Commercial Support Director and Director of Communications. The workshop explored why modern slavery should be treated as a strategic risk and examined its links to wider social, economic and environmental issues including climate change and supply chain resilience. It also covered external developments shaping stakeholder expectations, such as CCLA's Modern Slavery Benchmark and the emerging international standard ISO 37200 on managing the risk of modern slavery.

The workshop helped to demystify due diligence, address common misconceptions and remind attendees of what proportionate, risk-based due diligence looks like in practice. Participants worked through real-world examples where businesses had identified modern slavery concerns through due diligence, disclosed them transparently and had taken action to address impacts and support affected workers.

The workshop strengthened senior leaders' understanding of the nature and prevalence of modern slavery risk in construction, and enhanced their ability to provide informed oversight, set clearer expectations for delivery teams and support improvements in due diligence and transparency.

#### Beyond the Shadows video

Over the reporting period, we shared the Unseen Beyond the Shadows video on our intranet and at SLT events to help raise awareness of the hidden indicators of modern slavery and labour exploitation.

The two-minute video, developed by the construction sector for the construction sector, challenged misconceptions about who may be vulnerable to modern slavery and how exploitation may present in practice. It reinforced that modern slavery could affect people of any nationality and that the signs are not always visible or obvious, and that everyone has a role in speaking up and reporting any concerns, however small they may seem.

#### Supply Chain Sustainability School (internal capability building)

We have continued to be an active partner in the Supply Chain Sustainability School's Built Environment Against Slavery Group – the UK's largest anti-slavery collaboration in the built environment, and winner of the Unseen Business Partnership Award in 2025.

We have used the School to strengthen internal capability on sustainability topics, including modern slavery and human rights, drawing on a broad range of resources relating to modern slavery and labour exploitation.

Examples of resources we have used to upskill internal colleagues include the Operational Toolkit, Procurement Guidance: Addressing Modern Slavery Risks in Solar PV, Supply Chain Mapping Protocol, and Unseen's video: Beyond the Shadows on The Hub.



### My Competence

During the reporting period, we implemented a new competency framework, My Competence, to map the learning and capability required across different roles – including competencies relevant to managing modern slavery and wider human rights risks. It sets out mandatory learning pathways by role (from senior leaders to operational teams).

The framework includes continuing professional development (CPD) requirements and defined capability levels (from awareness to expert), enabling targeted learning according to role, responsibility and exposure to modern slavery risk. For example, Regional Procurement & Supply Chain Managers and Directors, and Category Leads are expected to have expert knowledge of ethical and responsible sourcing - including the Employer Pays Principles, and expert knowledge of modern slavery risks, how these impact procurement strategy, good practice due diligence and escalation of concerns. Whereas Senior Buyers are expected to have detailed knowledge and significant experience in these areas but is not the go-to person in the competency.

### **Training for our supply chain and partners**

#### Site induction

All workers coming onto our sites are required to complete a site induction, which includes guidance on spotting the signs of modern slavery and how to report concerns via Speak Up. During the reporting period, this was strengthened through the introduction of an additional slide explaining potential indicators of modern slavery and labour exploitation, helping to ensure workers understand how exploitation may present in practice and how concerns can be raised safely and confidentially.

### Regional roadshows

In 2025, we held four regional supply chain engagement roadshows across the North West, North East, Scotland and Yorkshire. Each event included dedicated content on our modern slavery objectives and progress, including our expectations that all relevant supply chain partners maintain a modern slavery statement, regardless of turnover.

The roadshows highlighted why our suppliers need to manage risk effectively, the prevalence of modern slavery in construction, examples of recent cases and their impacts, indicators that may be visible on site, and the support available to supply chain partners.



### Supply Chain Sustainability School

We continue to use the School as a key resource for developing our supply chain's capability on modern slavery and human rights, supporting continuous improvement and a common approach across our industry (the School is backed by 95% of the UK's main contractors).

We have encouraged and signposted suppliers to use the School's free due diligence assessment tool and action plan, and other free resources such as the Operational Toolkit and the Practical Guide to Understanding Modern Slavery Risks in Supply Chains. We have also encouraged our supply chain to join School webinars, for example 'Getting started with supply chain mapping' and 'An Introduction to modern slavery in construction.'

During the reporting period, 3,322 of our suppliers were registered with the School, and accessed School resources related to modern slavery and human rights more than 6,000 times.

## **13. Industry collaboration and shared learning**

We recognise that addressing modern slavery risk requires collaboration across the construction sector and wider stakeholder community. Many of the risks associated with labour exploitation are systemic and cannot be addressed by individual organisations acting alone. During the reporting period, we continued to engage with industry groups and collaborative initiatives to strengthen our understanding of emerging risks, share good practice, support improvements in sector-wide capability, and increase collective leverage to drive higher labour standards across the construction supply chain.



### Supply Chain Sustainability School's Built Environment Against Slavery Group

We continued to actively participate in the Supply Chain Sustainability School's Built Environment Against Slavery (BEAS) group, the largest anti-slavery collaboration within the UK built environment sector.

Through this collaboration, we both contributed to and drew upon practical sector-wide tools and resources designed to strengthen understanding of modern slavery risks, responsibilities, and effective due diligence practices. These included a modern slavery due diligence capability assessment aligned to BS 25700, a Combatting Slavery Operational Toolkit, and a Supply Chain Mapping Protocol.

Participation in the group also enabled us to align expectations, share intelligence and adopt more consistent approaches to modern slavery due diligence. By working collectively, main contractors and clients can increase our influence and leverage with suppliers and labour providers, helping us to drive improvements in labour standards and responsible recruitment practices that would be more difficult to achieve through individual action alone.

The group also provides a forum for sharing learning with industry peers and staying informed of evolving good practice, regulatory developments, and emerging stakeholder expectations.



### **CCLA Investment Management Modern Slavery CEO Roundtable on addressing modern slavery risks in construction, in collaboration with Cabinet Office and Supply Chain Sustainability School**

Our Procurement and Supply Chain Director contributed to a senior construction sector modern slavery roundtable delivered collaboratively by CCLA Investment Management, the Supply Chain Sustainability School, and the Cabinet Office, presenting a case study and participating in the discussion.

The session explored emerging expectations relating to modern slavery due diligence, transparency, governance, and supply chain engagement within the construction sector.

It also provided an opportunity to exchange insights with industry peers and identify areas for further improvement and consider how collective industry action can be used to increase leverage and address shared modern slavery risks.

Insights from the forum were shared internally and helped inform the continued development of our due diligence and transparency approach.

## **14. Grievances and remediation**

Our employees, workers, and supply chain partners can raise concerns through our confidential Whistleblowing Policy and/or through the Speak Up platform. Further details on the grievance mechanisms available are set out in our Whistleblowing Policy, which is

accessible to all employees and forms part of our wider approach to speaking up and reporting concerns safely and without fear of retaliation. Individuals raising concerns in good faith will not suffer retaliation, detriment or adverse treatment.

During the reporting period, one concern was raised through our whistleblowing channels. This was reviewed in line with our established procedures and was not identified as relating to modern slavery or labour exploitation.

Should concerns relating to modern slavery or human rights be identified, we aim to respond in a way that prioritises the safety and wellbeing of potentially affected individuals and supports appropriate remediation where issues are substantiated. Our Human Resources function forms an integral part of the response process where concerns involve workers, employment practices, welfare or safeguarding considerations, working alongside relevant operational, procurement and compliance teams to assess risks and determine appropriate actions.

Where a potential victim of modern slavery or labour exploitation is identified, our priority is the safety and wellbeing of the individual. Support may include access to welfare assistance, confidential counselling, safeguarding support, specialist charities and other appropriate external support services, depending on the circumstances of the case.

Our response may also include, where appropriate, escalation to relevant authorities, engagement with suppliers or partners to address identified issues, and actions to prevent recurrence.

Where supplier-related issues are identified, we use a proportionate escalation approach, which may include issuing corrective action requirements, suspension of work, enhanced monitoring, or termination of the relationship in cases of serious or repeated non-compliance. Termination of the relationship would always be a last resort as this can worsen outcomes for affected workers rather than remedy the harm caused. Where appropriate, we also seek to collaborate with suppliers to improve systems and controls to reduce the risk of recurrence.

## 15. Tracking progress – monitoring and evaluation

### Progress to date

**88%**

*of our total supply chain had a modern slavery statement in place during 2025*

- 88% of our total supply chain had a modern slavery statement in place during 2025, despite 85% of our supply chain being SMEs that are not legally required to publish a modern slavery statement.
- Through our supply chain mapping work completed through our Department for Education frameworks, we identified 483 tier 1 suppliers and 338 tier 2 suppliers. Of these, at least 27% have published a modern slavery statement (with 50% currently unknown), and at least 18% actively communicating their approaches to their own supply chains.
- 67% of subcontractors said they made their own supply chain aware of modern slavery legislation.

- Five higher risk suppliers were audited during the reporting period, compared with three in 2024.
- Two corrective action plans were implemented following supplier assessments, compared with none in previous years.
- Modern slavery e-learning completion (internal) reached rate 99% in 2025
- 304 colleagues engaged in learning through the Supply Chain Sustainability School, collectively completing more than 1,200 hours of CPD. Engagement has increased during the reporting period, with colleagues accessing 738 resources compared to 205 in the previous year.
- 3,322 of Tilbury Douglas' supply chain were registered with the Supply Chain Sustainability School in 2025, an increase of 111 compared with the previous year. These priority suppliers accessed 6,151 modern slavery and human rights-related resources, compared to 4,714 in the previous year, demonstrating increased engagement with available guidance and tools.

### KPIs for 2026

- Number of suppliers with a published, legally compliant modern slavery statement.
- Number of strategic suppliers with a named modern slavery lead or responsible officer.
- Number of high-risk suppliers audited or assessed (desktop / on-site).
- % of employees completing annual refresher training.
- Number of high-risk suppliers completing Supply Chain Sustainability School e-learning or school-based training linked to modern slavery and human rights.
- Number of modern slavery or labour exploitation concerns reported through Speak Up or other channels.

## 16. Continuous improvement – priorities for the year ahead

### Response and remediation

Strengthen our response plan so we can act quickly and confidently if a suspected case of modern slavery or serious labour exploitation is identified. This includes safeguarding the health, safety and welfare of those impacted, ensuring a people-centred, trauma-informed response.

In line with the principle of "Nothing about us without us," and building on recent leadership training, we will host a lived experience workshop facilitated by Align and a survivor with lived experience of labour exploitation. Insights from this workshop will inform the enhancement of our response and remediation approach, including improving risk identification and due diligence and strengthening internal guidance on safe escalation and victim support. We will also explore a pilot programme to upskill Mental Health First Aiders as first-line responders on site.

### Risk assessment and due diligence

Review and enhance our modern slavery risk assessment framework to support a more risk-based and embedded approach to due diligence. This includes exploring opportunities to further formalise and embed how modern slavery considerations are identified, assessed and documented within existing subcontractor selection and supply chain processes, with a focus on proportionality and practical implementation.

### Training and capability building

Continue to strengthen modern slavery awareness and capability across relevant business functions and operational roles. This will include targeted



training and workshops for site and project managers, enhancement of internal learning pathways through My Competence and the Supply Chain Sustainability School and improving awareness of whistleblowing channels and safe escalation routes.

### Procurement and supply chain

Continue to work collaboratively with supply chain partners, clients and industry stakeholders to strengthen awareness, due diligence and continuous improvement in relation to modern slavery risks within UK construction. This will include targeted engagement with higher-risk subcontractor trades, making better use of existing systems, workforce information and supplier data to support risk identification and monitoring, and continuing to develop our audit and due diligence approach to support more effective identification, assessment and management of potential risks.

In 2026 we are launching a social procurement strategy, a key part of which is a supply chain development programme aimed at helping our partners with specific learning pathways, including modern slavery, the Common Assessment Standard, Tendering, AI/digitalisation and Carbon.

## 17. Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Modern Slavery Statement for and covering the 12 months of the financial year ending 31 December 2025. It was approved by the Board on 20 June 2026.



**Craig Tatton**  
Chief Executive Officer







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