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1. INTRODUCTION

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that GEDA Construction has taken (and continues to take) to achieve the target of ensuring that modern slavery or human trafficking are not taking place within the business or its supply chain.

GEDA is committed to preventing modern slavery and human trafficking a commitment which is also guided by our core values of respect, unity, trust and positivity. These values shape how we treat our people, work with our supply chain and conduct our business, reinforcing our commitment to ethical practices, transparency and accountability across all operations

This statement was approved by the Board of GEDA and is published in line with the requirements of the Modern Slavery Act 2015. It outlines the actions we have taken to help prevent modern slavery and human trafficking within our operations and supply chains throughout the financial year ending 31 March 2026.

2. ORGANISATION BUSINESS, STRUCTURE AND SUPPLY CHAINS

Founded in 1982, GEDA is a construction and civil engineering company delivering both public and private sector projects across the UK and Ireland.

We operate as a private limited company, governed by our Managing Director and Board of Directors. There is a head office based in Dungannon, Northern Ireland and a regional office based in Kegworth, England. GEDA employs approximately 170 people, structured with a director team, management team, professionally qualified and skilled trades teams.

Our supply chain is a critical part of our operations and includes:

- Suppliers of processed, manufactured and raw materials, plant and equipment.
- Specialist trade and labour subcontractors.
- Professional service providers such as consultants and engineers:
    - Training providers
    - Agency workers

We recognise that the construction sector can present heightened risks of modern slavery, particularly in subcontracted labour and lower-tier supply chains. We are committed to working collaboratively with our supply chain partners to uphold ethical standards and prevent exploitation.

3. POLICIES AND PROCEDURES

Identify higher-risk business activities, geographical locations, sectors and suppliers, and explain the steps taken to reduce those risks. We maintain a range of policies to ensure that we conduct business in an ethical, transparent and responsible manner. These policies underpin our commitment to preventing modern slavery and human trafficking and include (amongst others):

- Anti-Fraud, Bribery & Corruption Policy
- Disciplinary & Grievance Policy
- Equality, Diversity & Inclusion Policy
- Equality of Opportunity Policy
- Fraud Prevention Policy
- Harassment & Bullying Policy
- Modern Slavery & Human Trafficking Policy
- Safeguarding Policy
- Supply Chain Policy
- Recruitment & Selection Policy
- Whistleblowing Policy

These policies set clear expectations for employees and supply chain partners; supporting a culture of accountability, fairness and ethical conduct.

4. DUE DILIGENCE

We undertake due diligence when engaging suppliers and subcontractors to ensure they align with our ethical standards and legal obligations. We operate a preferred supplier database and conduct due diligence on all suppliers before allowing them to become a preferred supplier. Our due diligence processes include:

- Supplier prequalification procedures.
- Requiring compliance with our Modern Slavery & Human Trafficking Policy.
- Ensuring contractual obligations include adherence to the Modern Slavery Act 2015.
- Verification of right-to-work documentation for all directly employed staff.
- Ongoing engagement with supply chain partners.

We expect all suppliers and subcontractors to:

- Operate in compliance with applicable laws and regulations
- Take appropriate steps to prevent modern slavery within their own operations and supply chains
- Report any known or suspected instances of modern slavery or human trafficking.

Failure to meet these standards may result in termination of business relationships.

5. ASSESSING AND MANAGING RISK

In assessing our risk we identified that the risk of modern slavery is most likely to arise within supply chains, particularly in areas such as:

- Labour-only subcontracting.
- Agency labour.
- Lower-tier suppliers.

- Materials sourcing and logistics.

To mitigate these risks, we:

- Assess suppliers and subcontractors during prequalification, procurement processes and onsite.
- Focus attention on higher-risk areas of the supply chain.
- Maintain oversight of labour practices on-site through management teams.
- Promote awareness of modern slavery indicators across our workforce.

We adopt a risk-based approach and continue to review and strengthen our processes in line with industry best practice.

6. TRAINING AND AWARENESS

We are committed to training and raising awareness of modern slavery and human trafficking across the business. With an additional focus of training and awareness with team members who are at a higher risk of exposure to potential modern slavery of human trafficking e.g. human resources, procurement, SHEQ and site-based teams. Training and awareness is raised through:

- Training:
  - Companywide online training
  - Toolbox talks
  - Stronger2gether (procurement and construction based)
- Awareness:
  - Policy & Procedures
  - SHEQ meetings
  - Supplier Newsletter
  - Site based posters (multi-language worker posters)
  - Provide links to and utilise the resources at www.stronger2gethre.org and Modern slavery - GOV.UK

7. MONITORING, EVALUATION AND ACTIONS TAKEN DURING THE YEAR

We monitor the effectiveness of our approach to preventing modern slavery through the ongoing review of our policies, procedures and working practices, as well as engagement with our employees and supply chain. During the financial year ending 31 March 2026, we have undertaken the following actions to strengthen our approach to preventing modern slavery and human trafficking in line with the Modern Slavery Act 2015:

7.1 Governance, Policy & Compliance

- Raised awareness of this published statement and the Modern Slavery Act by notifying organisations in our Frameworks, Delivery Partnerships and other Companies with which we regularly engage, through communicating that they must comply with the relevant legislation and there is a no tolerance approach.
- As part of the contracting processes, specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children are included.
- Reviewed and updated the Modern Slavery and Human Trafficking policy and procedure (January 2026).
- Policy available internally on SharePoint / resources and publicly viewable on website.

7.2 Recruitment & Employment Practices

- Continuation of the Verified Right to Work in the UK and Proof of Identity for every new employee.
- A continued ‘Real Living Wage Registered employer’ since October 2020

7.3 Training And Awareness

- Ongoing development and delivery of modern slavery awareness training – this was based on the gap analysis within the Company, collaborating with the Stronger Together team in 2020.
- Developed a new toolbox talk for modern slavery in February 2026 and rolled this out to sites.
- Raised awareness off modern slavery in SHEQ meeting in March 2026.
- Training completed on 'Tackling Modern Slavery in Construction and Property' in March 2026.
- Continuing to deliver Modern Slavery and Human Trafficking training.

7.4 Overview

- Created modern slavery task force to drive continuous improvement across the business.

7.5 Procurement and Supply Chain Management

- Board of Director member completed Stronger Together Training and leads this at a senior level within the business.
- Procurement Manager appointed over procurement team with responsibility for modern slavery within procurement.
- Procurement Manager attended Tackling modern slavery through purchasing practices (June 2025).
- Raised awareness in our Supply Chain Newsletter focusing on the signs and reporting of Modern Slavery and Human Trafficking (March 2026)

We also continue to monitor our supply chain through ongoing engagement with suppliers and subcontractors, as well as oversight by management teams across our projects and operations. Any concerns raised are investigated in line with our internal procedures.

During the financial year ending 31 March 2026, we are not aware of any instances of modern slavery or human trafficking within the business or supply chain. We remain committed to continuous improvement and will continue to enhance our monitoring and evaluation processes as our business evolves.

8. COMMITMENT TO CONTINUOUS IMPROVEMENT

We recognise that tackling modern slavery requires ongoing vigilance and improvement. We are committed to strengthening supply chain engagement, enhancing risk assessment processes, expanding training and awareness initiatives and reviewing and updating policies regularly

9. APPROVAL

This statement serves as our Modern Slavery and Human Trafficking statement for the year ending 31 March 2026. It has been approved by the Board of Directors of GEDA Construction and will be reviewed annually.



Aaron Hughes
Managing Director