Modern Slavery Statement for Financial Year 2024

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that The Castle Building Services Organisation Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Castle Building Services Organisation Limited has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

The Castle Building Services Organisation Limited provides a unique solution working with our clients to provide feasibility studies, cost planning, design management, and construction delivery. Our approach involves early stakeholder engagement, 3D design analysis, and teamwork to ensure project success.
Our team offers design services, Principal Contracting, MEP subcontracting, new builds, fit-outs and refurbs. While we have the in-house ability to provide multiple offerings, these are all united under one company and all share the same common values.

Our high risk areas

The Castle Building Services Organisation Limited highest risks exist primarily within our labour supply chains, particularly where agency or migrant labour is used. The use of third-party labour providers without thorough vetting can increase the risk of exploitation, especially where recruitment fees, lack of proper contracts, or inadequate oversight are involved.

Subcontractor management also presents potential risks, particularly in lower-skilled or short-term roles where transparency may be limited. The procurement of construction and MEP materials—such as electrical components, copper, and prefabricated systems—can carry hidden risks where products are sourced from overseas, particularly from regions with known labour rights concerns, even if

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purchased through UK suppliers. On-site practices can also be a risk area, including poor working conditions, withheld wages, limited understanding of rights due to language barriers, or over-reliance on informal labour arrangements. These risks highlight the need for robust due diligence, supply chain transparency, clear contractual requirements, workforce training, and accessible grievance mechanisms to ensure we effectively identify and mitigate modern slavery within our operations and supply chains.

We mitigate modern slavery risks through due diligence processes that include Pre-Qualification Questionnaires (PQQs) and clear contractual terms. All suppliers and subcontractors must confirm compliance with the Modern Slavery Act 2015 and demonstrate appropriate controls to prevent exploitation. Our contracts also include clauses allowing further investigation or audits where necessary, helping ensure ethical practices across our operations and supply chain

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Modern Slavery and Human Trafficking Policy This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act

Our suppliers

The Castle Building Services Organisation limited operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and on site audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

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In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Board of Directors on 13/05/2025



Andrew Dawson
Managing Director
13/05/2025

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