Slavery and Human Trafficking Statement

Financial year ended 31 May 2026

1. Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Horbury Group's slavery and human trafficking statement for the financial year ended 31 May 2026. Horbury supports the principles and aims of the Modern Slavery Act, has a zero-tolerance approach to slavery and human trafficking, and expects everyone in its supply chain to share these values.

We are committed to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure, as far as practical, that slavery and human trafficking are not taking place anywhere in our operations or supply chain.

2. Our structure and supply chain

Horbury Group consists of six companies, all based in the UK:

- Horbury Support Services Limited
- Horbury Joinery Limited
- Titan Interior Solutions Limited
- Titan Flooring Limited
- Environ Safety Management Limited
- Horbury Property Services Limited

The Group has its head office in Rotherham and operates in the construction, interior fit-out and joinery sectors.

Our supply chain is predominantly UK-based and falls into two main categories:

- Materials – mainly sourced from UK-based manufacturers and distributors. Where a supplier or manufacturer is based outside the UK, we carry out additional checks before approval, including reviewing their labour standards, relevant certification and compliance documentation, to satisfy ourselves that they meet the standards we expect across our supply chain.
- Labour – a limited number of preferred labour agencies and subcontract organisations, including self-employed operatives engaged under the Construction Industry Scheme (CIS).

3. Our policies

The following policies support our approach to preventing modern slavery and human trafficking:

- Whistle-Blowing Policy, with a formal reporting structure that allows concerns to be raised confidentially and escalated and resolved promptly.
- Recruitment and Right to Work procedures, ensuring everyone working for us has the legal right to work in the UK.
- Supplier and subcontractor selection procedures, which control how new suppliers are approved and monitored.
- Anti-Bribery and Corruption Policy.

These policies and procedures are reviewed annually and are available to all staff via our intranet.

4. Risk assessment and due diligence

We consider the modern slavery risk in our materials supply chain to be low. We will continue to make enquiries of suppliers and carry out audits to satisfy ourselves that their policies and procedures are robust.

We recognise that construction labour supply chains carry a higher risk, particularly where workers are engaged through agencies, subcontractors or several tiers of labour supply. Our main controls are:

- Subcontractor review – our Onboarding Team continually reviews our subcontractor register and all newly onboarded subcontractors to make sure checks are consistently carried out and to drive better performance and compliance across the supply chain.
- Electronic Right to Work and onboarding – we use an electronic Right to Work and onboarding system, which has improved the quality and consistency of our checks and helps us meet our legal duty to prevent illegal working.
- Third-party compliance audits – We co-operate fully with independent compliance audits of our labour supply chain, act on any findings, and keep under review how operatives are engaged.
- Agency engagement – we only use a limited number of preferred agencies and require them to confirm their own modern slavery compliance, pay rates and Right to Work processes.

5. Training and awareness

All new employees receive training on the signs of modern slavery as part of their induction. We continue to brief staff on modern slavery, human trafficking and their responsibilities through periodic updates by email, our intranet and posters.

The Group HR Manager keeps up to date with legal and good-practice developments by attending regular webinars and shares this with the wider team.

8. Approval

This statement was approved by the Board of Directors of Horbury Group at the meeting of 27th October 2026.

Trevor Wragg
Chief Executive
27/10/2026