



ANTI-SLAVERY & HUMAN TRAFFICKING

Modern Slavery & Human Trafficking Statement

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and outlines Knights Brown's commitment to preventing modern slavery and human trafficking in our operations and supply chains. It covers the financial year ending 31 March 2025 and has been formally approved by our Board of Directors.

Introduction

We recognise our responsibility to remain vigilant to the risks of modern slavery, however small, within our business and across our supply chain. All employees are expected to adhere to our Anti-Slavery and Human Trafficking Policy and report any concerns. This policy is accessible via our intranet, management system, and is accessible from the homepage of our website.

Managers are required to act on any concerns raised, whether internally or externally.

We are pleased to report that no instances of modern slavery have been identified within our business or supply chain during the reporting period.

Our Organisation and Structure

Knights Brown is an independent, multi-disciplinary construction company based in the UK, with a turnover exceeding £100 million. We share our expertise openly, listen carefully to our customers' aspirations, and deliver high quality solutions to the physical, financial, environmental and social challenges we face together.

We are committed to delivering excellence and our teams, known for being approachable, responsive and decisive, operate across southern England and Wales. Our specialist energy sector services are available throughout the UK.

Our head office and a regional office are located in Ringwood, Hampshire with additional regional offices in Rochester, Kent, and Bridgend, Wales. We employ approximately 300 staff and engage around 35 consultants, working closely with a small number of labour agencies.

Our Policy on Anti-Slavery and Human Trafficking

We are committed to conducting business ethically and with integrity. We have implemented systems and controls to help ensure, as far as practicable, that modern slavery and human trafficking do not occur within our business or supply chain.

Our guiding principles define the behaviours and standards we expect from ourselves and our partners. These are supported by key policies, including:

- **Anti-Bribery Policy** – Outlines our stance on bribery and corruption.
- **Modern Slavery and Human Trafficking Policy** – Details our approach to identifying and addressing modern slavery risks.

- **Whistleblowing Policy** – Provides a confidential mechanism for reporting concerns, available to both employees and supply chain partners.

[Whistleblowing-Policy.pdf](#)

Our Supply Chain

We work with approximately 550 subcontractors to deliver works and services on our construction sites and to source materials and manufactured products.

To mitigate risks within our supply chain, we:

- Foster long-term relationships with suppliers and clearly communicate our expectations.
- Require subcontractors to demonstrate compliance with our anti-slavery commitments as part of our vendor assessment process.
- Request evidence of suppliers' modern slavery policies or adherence to ours via a supplier declaration.
- Are regularly reviewing our supplier engagement processes to better address the complexities of a tiered and fragmented supply chain.
- Require labour agencies to conduct right-to-work checks. We are currently reviewing our agency engagement process to ensure compliance.
- Work with a sole supplier in southern England to better manage recruitment and have introduced a Preferred Supplier List for our Wales & Energy Division.
- Encourage all individuals to challenge unethical behaviour and report concerns.
- Have introduced an online site induction for all workers this year, including agency and supply chain personnel, to enhance scrutiny of qualifications.
- Are committed to prompt payment, aiming to meet the Fair Payment Code's silver standard of all supply chain invoices being paid within 60 days, with small business suppliers being paid within 30 days. Performance data is available on our website.

Due Diligence

In 2024–2025, we engaged over 400 suppliers in the materials & plant sectors. To date, we have contacted 220 of them regarding their anti-slavery policies. We remain committed to achieving full compliance, either through our policy or by recognising suppliers' own policies. Our buying team is working to complete this process during 2025–2026.

In January 2025, we introduced an Identity Services Provider (IDSP) to support right-to-work checks for all new employees. This forms part of a new recruitment process, with all hiring managers trained accordingly. A new HR system has also been implemented, improving onboarding compliance, access to policies and training delivery.

Training

To ensure awareness of modern slavery risks, we provide training to relevant staff. Our eLearning programme covers responsibilities, risk identification and appropriate actions. Training is delivered upon joining and refreshed every three years or sooner if needed. In 2022, we extended this training to relevant consultants.

All directors have been briefed on the topic.



Kevin Valentine

Managing Director | June 2025

This policy was approved electronically. Proof of signature is available upon request.