

Modern Slavery and Human Trafficking Statement

Introduction

This statement is made by Gratte Brothers Group Limited (the Group) pursuant to section 54 of the Modern Slavery Act 2015. It describes the steps taken during the financial year ending 31 March 2026, to identify, prevent, mitigate and respond to risks of modern slavery and human trafficking within the Group's operations and supply chain.

Our Business

The Group is a family-owned building services group providing mechanical and electrical engineering and maintenance, security systems and food service solutions. The Group operates from its London headquarters, branch offices and project locations across the United Kingdom and Ireland.

This is a joint Group statement covering the following entities:

- **Gratte Brothers Group Limited**
- **Gratte Brothers Limited**
- **Gratte Brothers Building Services Maintenance Limited**
- **Gratte Brothers Security Management Limited**
- **Gratte Brothers Catering Equipment Limited**
- **Gratte Brothers Technical Services Limited**

Our Workforce and Supply Chains

The Group's workforce comprises of permanent employees, agency workers and trade subcontractors. The Group is a registered member of the JIB, BESA and JIB PMES organisations and complies with and

ensures that labour supply agencies and labour-only subcontractors comply with the respective National Working Agreements.

The supply chain includes material and equipment suppliers, trade contractors, professional service providers, recruitment agencies and labour supply organisations.

Policies and Governance

The Group has a zero-tolerance approach to all forms of modern slavery and human trafficking including child labour within its operations and supply chain and is committed to acting ethically and with integrity in all business dealings. The Group is also committed to freedom of association, and this is supported by our Ethical and Sustainable Procurement Policy.

The Group respects all human rights including the Universal Declaration of Human Rights and the Ethical Trading Initiative Base Code and ensures minimum wages, hours and benefits for all its employees and supply chain to meet or exceed all local human rights legislation. These commitments ensure all employees and subcontractors are engaging in freely chosen employment.

Employees, suppliers and other stakeholders are encouraged to report any concerns relating to modern slavery or human trafficking. Concerns may be raised through management, the Groups whistleblowing arrangements or via relevant external organisations such as the Modern Slavery & Exploitation helpline on 0800 0121 700.

The Group seeks to assess concerns promptly, protect confidentiality and prevent retaliation. Where indicators are identified,

the Group will prioritise the safety and welfare of affected people, involve the appropriate authorities where necessary, undertake an investigation and implement any remediation actions identified.

Due Diligence

The Group's supplier approval arrangements include prequalification and the use of the Common Assessment Standard (CAS) where applicable, periodic reapproval, ethical and sustainable procurement requirements, labour provider controls and risk-based second party audit activity.

Modern Slavery considerations form part of the supplier and subcontractor assessments. Where concerns or inconsistencies arise, the Group may request additional evidence, apply enhanced due diligence, require corrective actions, restrict approval or reconsider the relationship.

The Human Resources department maintains a Preferred Supplier List (PSL) for recruitment and labour supply organisations and reviews relevant compliance arrangements including organisational structure, accreditations, right-to-work checks, wage arrangements, occupational health and pension provisions.

Risk Assessment

The Group adopts a risk-based approach to identifying, assessing and managing modern slavery risks within its operations and supply chain. The Risk Director oversees and manages the level of risk exposure to the Group. The outcome of risk assessments is used to prioritise due diligence, supplier engagement, audit activity, training and corrective actions.

Supply chain mapping is undertaken to identify procurement activities and geographical locations that may present a higher level of risk of modern slavery.

Members of the Human Resources, Procurement and Site Operations teams receive specialist training on preventing and tackling modern slavery to assist in identifying where potential high-risk companies may be engaged and raises awareness of how to spot signs of modern slavery.

Actions taken to date

- Registered and completed a self-assessment using the Supplier Ethical Data Exchange (SEDEX) to identify and mitigate risks of slavery and human trafficking.
- Relevant staff have undertaken specialist training relating to the risks of modern slavery.
- Modern Slavery questions added to the Group's audit matrix checklist for supply chain members, and an audit programme developed to include second party audits of Tier 1 trade contractors and PSL labour supply agencies.
- Appointed an external verification specialist to undertake the supply chain approval process using the Common Assessment Standard (CAS). This assessment included questions on corporate social responsibility covering modern slavery.
- Conducted risk assessments on contractors based on their size, nature of work and amount of work carried out, which was used to identify key audit targets.
- The Ethical and Sustainable Procurement policy is regularly reviewed and sets criteria for carrying out procurement activities.

- Worked with an external eLearning organisation to provide a mandatory online training module for all employees on modern slavery awareness.
- Development of Key Performance Indicators (KPIs) to measure and monitor the effectiveness of the Group's activities. These include the completion rate of awareness training, the number of supplier approvals and reapprovals, the number of supplier audits completed, and the number of concerns raised, investigated and resolved.

Training & Awareness

A mandatory Modern Slavery awareness eLearning module is completed by all permanent employees and raises awareness of modern slavery risks. This module is part of the onboarding process for new employees to be completed during the probation period.

Specialist awareness training has been provided to relevant Human Resources, Procurement and operational employees. Training is intended to help staff recognise risk indicators, understand reporting routes and how to respond appropriately. This training is reviewed and refreshed, as necessary.

Future Objectives

The Group plans to continue to manage the risk of modern slavery through the following activities:

- Maintain effective awareness training and timely new-starter completion.
- Provide role specific refresher training to higher risk roles.
- Review and audit all Preferred Supplier List labour supply agencies.
- Improve visibility in general awareness, communication and reporting arrangements.
- Complete an annual governance review of risks, performance and improvement action before the approval of the next statement.

This statement was approved by the Board of Gratte Brothers Group Limited on 17 September 2026.

Signed: 

D Gratte
Group Managing Director
17 September 2026