

Our Modern Slavery Statement

Year Ending 31st December 2025



A Message from our CEO

People Make Places

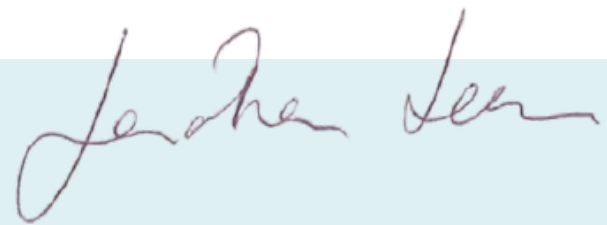
For more than 125 years, Seddon has not only built homes, and community spaces, we have built trust. As a fourth and fifth generation family business, we recognise that our responsibility extends far beyond the physical structures we create. It reaches into every relationship, every supply chain, and every person whose work contributes to ours.

Modern slavery, in all its forms, has no place in our business, our industry, or our communities. We are unequivocal in our stance: exploitation is incompatible with who we are and what we stand for. Our duty is to ensure that everyone who works with us and for us is treated with dignity, respect, fairness, and safety, without exception.

In an industry with complex labour models and vast supply networks, vigilance and action are essential. That is why we are strengthening our approach, investing in deeper transparency, and challenging ourselves and our partners to go further. We are enhancing due-diligence processes, embedding ethical sourcing standards, and working closely with recruitment partners, subcontractors, and suppliers to identify and address risks before harm can occur.

Our vision is bold: a construction supply chain where ethical practice is the default, not the aspiration; where exploitation cannot thrive because systems, culture, and leadership remove the conditions that allow it. We are committed to using our scale, influence, and long-standing relationships to drive positive change across our sector.

This is not a one-year initiative, it is a long-term commitment, woven into the DNA of our business for this generation and the next. We will continue to challenge ourselves, evolve our practices, and hold ourselves accountable. Because building places is our business, but protecting people is our duty.



Jonathan Seddon
Chief Executive Officer



Our Business Structure

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (MSA) and describes the steps taken during Financial Year 2025 to identify, mitigate, and remediate modern slavery risks. The statement also includes our plans for the Financial Year 2026.

Publication: this statement will be:

- Published on the UK Government Modern Slavery Statement Registry; and
- Prominently linked from the homepage of www.seddon.co.uk.

Seddon Group Structure

- Seddon Group Limited and Seddon Real Estate Limited undertake building, construction and maintenance projects throughout the UK through its subsidiary companies: Seddon Construction (including Seddon Housing Partnerships, Seddon Property Services, Seddon Engineering Services and Seddon Painting & Maintenance) Seddon Developments, and Seddon Homes. We operate across housing, education, healthcare, heritage and commercial sectors.
- Entities covered: This statement covers Seddon Group Limited and Seddon Real Estate Limited and the subsidiaries listed above. Where references are made to “we”, “our” or the “Group”, these refer to all covered subsidiaries.

Our Business, Workforce & Supply Chain

- Our Operations: UK-based construction and maintenance services delivered via project sites, regional offices and support functions.
- Workforce Profile: Direct employees (staff and site operatives), contingent agency workers, and subcontracted labour. Include here what the group workforce is made up of between monthly and operatives.
- Supply Chain: Tier 1 suppliers include subcontractors, labour providers, recruitment agencies, product and material suppliers (e.g., aggregates, steel, timber, stone, M&E components), plant hire, IT hardware/software, professional services and consultancies.
- Lower-tier suppliers include manufacturers and raw material producers, including some with international footprint
- Higher-risk areas (indicative):
- Labour provision: subcontractors & recruitment/temporary labour agencies.
- Certain products/materials with known global risk profiles (e.g., stone, bricks and tiles, steel, solar components, PPE, electronics).
- Services in cleaning, catering, and security on sites and offices.

Our Policies

Our stance against modern slavery and human trafficking is underpinned by a range of internal policies designed to promote ethical and transparent business practices. These policies provide clear guidance to our employees, subcontractors, and suppliers, ensuring that everyone connected to our business understands their responsibilities in helping to prevent exploitation.

We are committed to upholding the following policies:

- Modern Slavery Policy - underpins our commitment to ethical conduct across our operations and supply chains.
- Recruitment Policy – embedding fair, lawful, and transparent recruitment processes and prohibiting the use of forced, bonded, or involuntary labour.
- Whistleblowing Policy – enabling employees, subcontractors, and other stakeholders to raise concerns about unethical or unlawful conduct, including modern slavery, in confidence and without fear of reprisal.
- Sustainability Policy & Statement – embedding modern slavery risk assessments into all purchasing and subcontracting decisions.
- Health, & Safety Policy – to highlight our commitment to safe working conditions and prevention of labour exploitation through unsafe environments.
- Equality, Diversity & Inclusion Policy – ensuring equal treatment and reducing the vulnerability of at-risk groups to exploitation.
- Grievance Policy - We are committed to preventing modern slavery by providing clear channels for raising concerns. Our Grievance Policy enables employees and workers to report suspected unethical practices, including modern slavery, in a confidential and safe manner. All concerns are taken seriously and investigated promptly, supporting a culture of transparency and accountability.

Our Supply Chain

As a family-run construction company, we recognise that the risk of modern slavery and human trafficking can arise across both our operations and our supply chain. Our supply chain includes subcontractors, labour providers, consultants, and suppliers of materials and equipment, and we acknowledge that its layered and diverse nature requires careful oversight.

We are committed to managing these risks through a proactive and practical approach. This includes carrying out risk-based assessments, undertaking appropriate due diligence, and maintaining open engagement with our supply chain partners. We consider factors such as the nature of the work, geographic location, and the type of labour involved when assessing potential risks.

As part of our onboarding process, we require suppliers to complete pre-qualification checks to help us understand their policies, practices, and approach to labour standards. We also communicate our expectations clearly, including how to recognise and report potential indicators of modern slavery.

We continue to review and strengthen our processes to ensure they remain effective in identifying and addressing risks within our supply chain, supporting our commitment to ethical business practices.



Supply Chain Due Diligence

We enter into formal agreements with our supply chain partners which set out clear expectations regarding compliance with the Modern Slavery Act 2015 and our own Modern Slavery Policy. These agreements include provisions that allow us to review and assess compliance where appropriate.

Responsibility for overseeing supply chain compliance sits with our Group Governance Committee, chaired by our Legal & Compliance Director. We have a dedicated Supply Chain Manager who maintains regular engagement with suppliers and subcontractors.

To support understanding, we share practical guidance with our partners, including information on right-to-work checks and recognising potential indicators of modern slavery. This helps ensure that expectations are clear and consistently applied.

We monitor compliance through a combination of internal audits and independent assessments.





Training

We recognise that effective training is a cornerstone of our approach to preventing modern slavery and human trafficking across our business and supply chain. All employees, including site-based staff, receive training on modern slavery as part of a comprehensive onboarding process, and the topic is embedded in our employee handbooks. Further annual training is provided to relevant employees through our e-learning platform.

Training follows our reporting process for modern day slavery including spotting the signs and reporting.

We also deliver toolbox talks to both employees and our supply chain, ensuring that modern slavery risks and prevention measures are regularly discussed in practical, site-focused sessions. Looking ahead, we are working with our supply chain partners to launch lunch-and-learn sessions on modern slavery to further promote awareness and engagement.

Through these initiatives, we aim to ensure that everyone connected to our business understands the risks of modern slavery, their responsibilities, and the actions they can take to uphold our commitment to ethical practices.

Sign Off – Board and Governance Approval

This Modern Slavery Statement has been reviewed and approved by the Seddon Board of Directors. It reflects our commitment to identifying, preventing, and addressing modern slavery risks within our business and supply chains.

Signed on behalf of Seddon:

A handwritten signature in brown ink, appearing to read 'Jonathan Seddon', written in a cursive style.

Jonathan Seddon
Chief Executive Officer



Our Action Plan

ACTION
CHANGES
THINGS



Governance, Oversight & External Challenge. Establish strong leadership, accountability and independent assurance

Completed

- During 2025 we have established a Group Governance Committee (GGC) Chaired by our Legal and Compliance Director.
- Progress of the MSAP and associated KPIs reported to the Group Governance Committee (GGC) Chaired by Risk & Compliance Director who will be responsible for the MSAP delivery, decision-making and escalation. The GGC is a formal governance meeting with MDs of Seddon businesses.
- Reviewed our Modern Slavery Statement.

Planned

- Create "new" Modern Slavery Action Plan (MSAP) for board approval. To be complete by April 2026.
- During 2026 progress of the MSAP and KPIs will be continually reviewed by the GGC.
- Publish revised Modern Slavery Statement in accordance with the MSAP (updated annually to align with progress against MSAP).



Policy, Framework & Baseline Assessment. Understand where we are today and define where we need to be

Completed

- In 2025 we reviewed our current Modern Slavery Policy, Statements & Procedures. Including associated policies (HR, procurement/commercial, whistleblowing, H&S, ethics).
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Planned

- During 2026 we will continue to review as appropriate and update policies, where appropriate.
- During 2026 we shall report findings and implement continuous improvements from the gap analysis and these will be shared with MDs / Group Governance Committee (GGC).



Training, Awareness & Culture – Embed understanding and accountability across the organisation

Completed

- Review and update current training / messaging against MASP recommendations completed in 2025.

Planned

- Deliver Annual Targeted Modern Slavery Training for Employees. Role-specific matrix (HR, procurement/commercial, governance, site management, leadership).
- Deliver Targeted Training & Awareness for the Supply Chain. Focus on higher-risk suppliers and labour models and share training with the supply chain via the supply chain portal/conferences/events and project level induction platform.
- Publish Guidance for employees and suppliers, using the Hub and Supply Chain Portal.
- Roll out posters /information/education campaigns.
- Embed Modern Slavery into Core Business Activities through all onboarding / inductions / supply chain events / conferences and briefings.



Policy & Contractual Alignment. **Ensure expectations are embedded consistently across the business**

Planned

- Following policy review we will update appropriate policies and procedures following the gap analysis and review, ensure consistency across internal / external documentation.
- Update supply chain and supplier onboarding/contracts and Pos.
- Ensure intent and obligations are clearly understood by suppliers and issue formally.



Risk Assessment & Supply Chain Assurance – Focus resources where risk is greatest and drive continuous improvement.

Planned

- Following gap analysis, create a Risk-Based Segmentation (RBS) for the Supply Chain- High / Medium / Low risk Labour model, geography, spend and role.
- Establish a Gap Analysis of Supplier & Labour-Only Subcontractor Compliance against RBS.
- Ongoing tools audit (UNSEEN)
- Undertake Government MSAT (Modern Slavery Assessment Tool).
- Create Project level (internal) audit questions to add to current safety audits.
- (3rd party) Project level audit.



Speak-Up, Escalation & Remediation – Ensure issues can be raised safely and addressed effectively.

Planned

- Promote and Monitor the Whistleblowing Hotline making sure it is accessible to employees and supply chain (include translation services) - regular monitor and report to CGG.
- Develop and publish an Escalation & Remediation Procedure (with UNSEEN) with clear steps for investigation, protection and resolution. This should be a victim centred approach linked to external signposting and support where required.



Transparency & External Reporting – **Demonstrate accountability and continuous improvement**

Planned

- Publish Seddon's Revised Modern Slavery Statement, which will include actions taken, risks identified and future commitments, ongoing Performance Monitoring & Continuous Improvement.
- Report MASP to CGG each Q

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