



Modern Slavery & Human Trafficking Statement

1. Introduction

- 1.1 This Modern Slavery and Human Trafficking Statement relates to actions and activities during the period 1st May 2026 to 30th April 2027.
- 1.2 The statement sets down Applebridge Group Limited commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

2. Organisational Structure and Supply Chains

- 2.1 The Applebridge Family Group of businesses is a group of eight specialist construction companies offering end-to-end civil engineering, groundworks, earthworks and utilities services across with offices in North East, North West, Yorkshire and Derbyshire, with expert teams of specialists bringing decades of collective industry experience.

2.2. Our Business and Supply Chains

The Applebridge Family Group Limited operates in the United Kingdom and delivers a range of construction services. Our supply chain includes (non-exhaustive):

- Construction materials (aggregates, concrete, asphalt, drainage, precast, steel products).
- Plant hire and maintenance, fuel, logistics/haulage, and waste management.
- Subcontract works (groundworks, reinstatement, surfacing, drainage, testing, specialist civils).
- Labour providers (agency labour and subcontract labour).
- Corporate goods and services (PPE, tools, IT, facilities services).

Our suppliers are primarily UK-based. Some products and components may originate outside the UK through distributor supply chains.

2.3. How we Assess Higher Risk Activities and Suppliers

We use a risk-based approach to identify where modern slavery or human trafficking risk could sit in our operations or supply chain. We assess risk at onboarding and review it during the relationship using the following factors:



- **Category risk:** labour-intensive services; use of temporary/agency labour; multi-tier subcontracting; low-margin/price-pressured services; off-site manufacturing.
- **Supplier risk:** limited trading history; lack of relevant policies; unwillingness to provide required information; adverse information; repeated non-conformance; poor worker welfare indicators.
- **Geographic risk:** where supply routes involve higher-risk regions via upstream manufacturing or sourcing.
- **Project risk:** short mobilisation periods, high demand for labour, remote sites, and large volumes that increase reliance on subcontracting.

Where a supplier/category is assessed as higher risk, we apply enhanced checks (see section 6).

3. Responsibilities

Responsibility for the Company's anti-slavery initiatives is as follows:

- **Policies:** - Group HR Manager is responsible for creating and reviewing policies.
- **Risk assessments:** - Group Health & Safety Manager is responsible risk assessments in respect of human rights and modern slavery.
- **Due diligence:** - Group Managing Director is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

4. Policies

- 4.1 The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.
- 4.2 The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:
- **Whistleblowing Policy** - The company encourages all its workers, customers, and other business partners to report any concerns related to its direct activities or its supply chains.
 - **Corporate Social Responsibility (CSR) Policy** - The Company's CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.
 - **Ethical Sourcing Policy** - The company policy which sets out how the Applebridge Family group of companies manages ethical, safe and responsible sourcing across its supply chain.





5. Due Diligence Processes for Slavery and Human Trafficking

5.1

We carry out proportionate due diligence when onboarding new suppliers and labour providers and during periodic review. This includes, as applicable:

- Verification of company identity and trading status (company details, VAT, registered address).
- Review of relevant insurances, licences and accreditations where required (for example H&S and quality credentials).
- Confirmation of modern slavery controls (modern slavery statement or policy, whistleblowing route, approach to labour standards).
- Contract / PO terms that require lawful employment practices and permit action where serious breaches are suspected.
- Performance monitoring through project feedback, non-conformances, and site-based observations.

For labour providers and labour-intensive subcontract packages, our checks may include additional focus on right-to-work controls, payment practices, use of subcontract labour, and worker welfare arrangements.

6. Risk Areas & How We Manage Them

We recognise higher inherent risk can exist in: (i) temporary labour and labour-intensive subcontracting, (ii) multi-tier supply routes for manufactured goods, and (iii) logistics/haulage and low-margin services.

Controls we use include:

- Approved supplier/labour provider onboarding with risk rating and enhanced checks for higher-risk categories.
- Clear contractual requirements on lawful labour practices, worker treatment, and reporting concerns.
- Ongoing monitoring via site feedback, supplier performance reviews, and investigation of non-conformances or concerns.
- Right to suspend, offboard, or escalate to relevant authorities where there is credible concern.
- Reporting routes for staff and third parties (line manager, Procurement, HR, whistleblowing channels).





7. Measuring Effectiveness

We track our approach using practical indicators, which may include:

- % of new suppliers/labour providers risk-assessed at onboarding.
- % of suppliers asked for modern slavery controls (statement/policy/confirmation) where relevant to the category.
- Number of suppliers categorised as higher risk and number subject to enhanced checks.
- Number of modern slavery concerns raised through management or whistleblowing channels and outcomes/actions taken.
- Training completion rates for staff in procurement and relevant management roles.

KPIs are reviewed internally and used to target further checks and improvement activity.

8. Training

We provide awareness and guidance to relevant roles so staff can spot and report concerns. This includes:

- Guidance for procurement and supplier management staff on supplier risk indicators and escalation routes.
- Providing mandatory training for our staff on Modern Slavery & Human Trafficking, reporting concerns which is refreshed on an annual basis.
- Provide access to staff to our Modern Slavery & Human Trafficking statement and other policies and refresher communication when reviews take place or key risks change.

9. Remediation

- Where concerns are identified, we investigate and act proportionately. Actions may include corrective action plans, enhanced monitoring, suspension of supply, termination of the relationship, and referral to appropriate bodies where required.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated, as necessary. The Management Board of Directors endorses this policy statement and is fully committed to its implementation.



Version Number: 004
Version Date: 1 May 2026
Version Expiry: 30 April 2027
Version Status: Live

Document Type: Policy
Business Area: HR
Document ID Number: HR-POL-013-004
Document Classification: Internal Use Only



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This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Chris Brown

Position: Group Managing Director

Signature: 

Date: 1st May 2026

