

Modern Slavery and Human Trafficking Statement

Financial Year Ending 31 March 2025

Introduction

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Procast Building Contractors Ltd's slavery and human trafficking statement for the financial year ending 31 March 2025.

Procast Building Contractors Ltd is committed to preventing slavery and human trafficking in its corporate activities and supply chains. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships.

Our Organisation

Procast Building Contractors Ltd is a family-owned Scottish construction company headquartered in Hamilton, South Lanarkshire, with additional offices in Aberdeen, West Lothian, and Cumbria. We employ over 130 staff members and operate primarily across Scotland and Northern England.

Our business specialises in:

- · Energy efficiency retrofits and renewable energy installations
- Social housing improvements and maintenance
- RAAC (Reinforced Autoclaved Aerated Concrete) roof replacement projects
- Mechanical and electrical installations

We deliver annual contracts valued at approximately £35 million, working primarily with local authorities including North Lanarkshire Council and East Renfrewshire Council, as well as housing associations and private sector clients.

Our Supply Chains

Our supply chains include:

- · Building materials suppliers and merchants
- Specialist subcontractors (electrical, mechanical, roofing, renewable energy installations)
- Plant and equipment hire companies
- Professional services (design, engineering, surveying)
- Labour agencies and recruitment services

We recognise that our industry can be vulnerable to modern slavery risks, particularly in relation to labour supply chains, and we are committed to understanding and mitigating these risks.

Policies and Governance

We have implemented the following policies to ensure high standards of ethical conduct:

Modern Slavery Policy: Our dedicated policy sets out our commitment to preventing modern slavery and outlines the responsibilities of employees, contractors, and suppliers.

Whistleblowing Policy: We encourage all employees, contractors, and supply chain workers to report any concerns about modern slavery or unethical practices without fear of retaliation.

Recruitment and Employment Policy: We ensure all employees have the right to work in the UK and are employed under fair terms and conditions that comply with UK employment law.

Supplier Code of Conduct: We require our suppliers to adhere to ethical business practices and comply with all applicable laws, including those relating to modern slavery.

Due Diligence Processes

We have implemented the following due diligence processes:

Supplier Pre-Qualification: All new suppliers complete our pre-qualification process, which includes questions about their modern slavery policies and practices. Suppliers must confirm compliance with the Modern Slavery Act 2015.

Contract Terms: Our standard contract terms include provisions requiring suppliers to comply with modern slavery legislation and allow us to terminate contracts if breaches are discovered.

Risk Assessment: We assess the risk of modern slavery in our supply chains, with particular focus on:

- Labour-only subcontractors and recruitment agencies
- Suppliers of materials from high-risk countries
- Lower-tier suppliers in our supply chain

Site Monitoring: Our site management teams are trained to identify potential indicators of modern slavery, including poor working conditions, inadequate PPE, and workers who appear under duress.

Risk Areas and Mitigation

We have identified the following areas of potential risk:

Labour Supply: The construction industry's reliance on labour agencies and subcontractors presents risks. We mitigate this by:

- · Using only approved agencies and subcontractors who have been vetted
- Conducting site visits and worker welfare checks
- Ensuring workers have proper contracts and are paid fairly

Materials Supply: Complex international supply chains for building materials may present risks. We mitigate this by:

- Sourcing from reputable UK and European suppliers where possible
- Requesting supply chain transparency from material suppliers
- Prioritising suppliers with robust ethical policies

Training and Awareness

We provide training to relevant staff including:

- Management and supervisory staff receive training on identifying signs of modern slavery
- Procurement and commercial teams are trained on supply chain risks and due diligence requirements
- Site staff receive awareness briefings on worker welfare and reporting concerns

Effectiveness

We assess the effectiveness of our approach through:

- Annual review of supplier compliance with modern slavery requirements
- Incident reporting and whistleblowing mechanisms (no incidents reported in FY 2024/25)
- Regular audits of high-risk suppliers and subcontractors
- · Feedback from site teams on working conditions observed

During the year ending 31 March 2025, we:

- Updated our supplier pre-qualification process to strengthen modern slavery due diligence
- Conducted training for 15 managers and supervisors on modern slavery awareness
- Audited 100% of our labour supply agencies for compliance
- Identified no instances of modern slavery within our operations or supply chains

Future Commitments

In the next financial year, we commit to:

- Implementing an enhanced supplier audit programme for high-risk categories
- Developing KPIs to measure our effectiveness in combating modern slavery
- Expanding training to include all site supervisors and foremen
- Engaging with industry bodies to share best practices

Approval

This statement has been approved by the Board of Directors of Procast Building Contractors Ltd.

Signed:

Name: John Patrick

Position: Commercial Director

Date: 03/03/25

Published: 03/03/25

Next Review: March 2026