

# MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

**Financial Year Ending:** 31st March 2026

## 1. Introduction

This statement is made pursuant to **Section 54 of the Modern Slavery Act 2015**. Although **Tilsley Groundworks Limited** does not currently meet the annual turnover threshold of £36 million that mandates a legal statement, we voluntarily publish this policy to demonstrate our commitment to ethical trading. We recognize that modern slavery is a crime and a violation of fundamental human rights, and we have a zero-tolerance approach to it within our business and supply chain.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

## 2. Organizational Structure & Supply Chain

**Tilsley Groundworks Limited** is a privately owned Civil Engineering and Groundworks contractor based in Staffordshire, operating primarily within the West Midlands "Golden Triangle."

- **Our Business:** We act as a Principal Contractor and Sub-Contractor for commercial and residential developments. We operate without any subsidiary companies.
- **Our Supply Chain:** Our supply chain is 100% UK-based. We procure goods and materials from national and local merchants, including but not limited to:
  - Aggregates & Concrete
  - Plastic Pipework & Drainage
  - Fuel (HVO & Diesel)
  - Plant & Machinery (Volvo Construction Equipment)
  - PPE & Site Consumables

## 3. Our Policy on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships.

### **Direct Employment Strategy**

Our primary defense against modern slavery is our recruitment model. Unlike many competitors who rely heavily on transient agency labor, **Tilsley Groundworks prioritizes direct employment.**

- We generally do not use recruitment agencies.
- We recruit locally from Staffordshire and the surrounding counties.
- We perform rigorous "Right to Work" checks on all employees prior to their start date.
- We pay all employees directly into their personal bank accounts (no cash-in-hand payments).

## **4. Due Diligence Processes for Slavery and Human Trafficking**

As part of our initiative to identify and mitigate risk, we have put in place the following systems:

- **Supplier Accreditation:** We rely on established industry accreditations (such as **CHAS** and **Constructionline**) to pre-vet our major suppliers. We expect all our partners to have suitable anti-slavery and human trafficking policies and processes.
- **Supplier Vetting:** Moving forward, we are introducing specific questions regarding modern slavery into our new supplier onboarding process.
- **Site Spot Checks:** Our Contracts Managers and Site Foremen conduct regular site visits. As part of their health and safety audits, they monitor the welfare of all operatives on site to identify any signs of exploitation.

## **5. Risk Assessment**

We consider the risk of modern slavery within our direct operations to be **Low** due to our direct employment policy and close family management structure.

We recognize that the risk may be higher within the material supply chain (e.g., the extraction of raw materials or manufacturing of PPE). To mitigate this:

- We source materials almost exclusively from reputable, national UK merchants who have their own robust ethical trading policies.
- We avoid sourcing materials directly from high-risk countries.

## **6. Training & Awareness**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are committed to implementing the following:

- **Toolbox Talks:** We will be rolling out specific training modules for our Site Foremen and Leadership Team to help them identify the signs of modern slavery (e.g., lack of identification documents, signs of physical abuse, forced overtime).
- **Whistleblowing:** We are reviewing our internal reporting mechanisms to ensure that all staff feel safe and supported in reporting any concerns they may have about the treatment of colleagues or workers in our supply chain.

## **7. Board Approval**

This statement has been approved by the Board of Directors of **Tilsley Groundworks Limited** and will be reviewed and updated annually.

**Signed:**

**Jon Tilsley Managing Director Tilsley Groundworks Limited**

**Date:** 25<sup>th</sup> of February 2026