

1. Introduction from the Joint Managing Directors

We are committed to improving our practices to combat slavery and human trafficking.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

2. Organisation Structure

We are a provider of Groundworks, Infrastructure, Building and Refurbishment, Surfacing and Drainage services covering a wide spectrum of sectors including the challenging environments of petrochemical, rail, energy and utilities. We have over 500 employees and operate in the UK only.

3. Our Business

Our business is organised into ten operational divisions, including:

- Civil Engineering
- Building
- Energy
- East of Scotland
- Northern England
- Surfacing
- Small Works
- Strategic Projects
- Drainage
- Southern England

4. Our Supply Chain

Our supply chains include:

- Subcontractors.
- Recruitment agencies.
- Material suppliers.
- Plant and equipment suppliers.
- Professional services.

We recognise that modern slavery risks may be greater in parts of the supply chain involving labour provision, subcontracted works, recruitment agencies, lower-tier subcontracting and extended material supply chains.

5. Risk Areas in Our Business and Supply Chains

Luddon Construction Ltd has reviewed the parts of its business and supply chains where there may be a risk of slavery and human trafficking taking place. The level of risk varies depending on the nature of the work activity, the use of labour, the visibility of lower-tier suppliers and the origin of goods or materials supplied.

Through our annual review process, we have identified the following areas as presenting a potentially higher risk:

- Labour-only subcontractors and agency workers where the source of labour may be less visible.
- Recruitment agencies supplying temporary or short-term workers.
- Subcontracted construction work packages where labour may be provided through lower-tier subcontractors or labour-only arrangements.
- Supply chains involving lower-skilled labour.
- Suppliers involved in the manufacture of construction materials and workwear where production may occur outside the UK.
- Plant and equipment supply chains where products may contain components sourced from multiple countries.

We consider the overall risk within our directly employed workforce to be low due to our recruitment controls, right-to-work verification, payroll controls and direct supervision arrangements.

To assess and manage modern slavery risks, Luddon Construction Ltd:

- Undertakes supplier due diligence through our pre-qualification and approval processes.
- Requires suppliers and subcontractors to confirm compliance with the Modern Slavery Act 2015 and applicable employment legislation.
- Verifies the identity and right to work of employees prior to engagement.
- Uses reputable recruitment agencies that are expected to follow ethical recruitment practices.
- Maintains whistleblowing arrangements that allow concerns to be raised confidentially.
- Reviews supplier performance and compliance during contract delivery.
- Monitors higher-risk activities through project management, site supervision, workforce engagement and reporting routes.
- Provides modern slavery awareness information and training to relevant employees responsible for procurement, recruitment, supply chain management and project delivery.

Where concerns are identified, we will investigate promptly and, where appropriate, require corrective actions or terminate the relationship with the supplier, subcontractor or agency.

6. Our Policies 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 and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to prevent, identify and address the risk of slavery and human trafficking in our business and supply chains.

We undertake all relevant pre-employment checks prior to staff being employed. We carry out fair and transparent recruitment processes and ensure our recruitment agencies comply with these requirements in the provision of agency staff.

7. Due Diligence Processes for Slavery and Human Trafficking

As part of our approach to identifying and mitigating risk, we have systems in place to:

- Assess modern slavery risk by supplier type, work activity and supply-chain arrangement.
- Review relevant subcontractors, suppliers and agencies through our pre-qualification and approval processes.
- Require suppliers and subcontractors to comply with our expectations on modern slavery, ethical labour and legal employment practices.
- Monitor higher-risk activities through project management, site supervision, workforce engagement and reporting routes.
- Maintain reporting and escalation arrangements, including whistleblowing protections.
- Take appropriate action where concerns are identified.

8. Supplier Adherence to Our Value and Ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics we have in place a supply chain compliance programme. This consists of a pre-qualification process which requires our suppliers to demonstrate commitment to combatting modern slavery and human trafficking.

9. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant staff.

10. Our Effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Supply chain commitment to tackling modern slavery and human trafficking.
- Number of relevant suppliers assessed through pre-qualification.
- Number of modern slavery concerns raised, investigated and closed out.
- Completion of modern slavery awareness training by relevant staff.
- Review of higher-risk suppliers, subcontractors and labour providers.
- Actions taken following supplier reviews, audits or concerns.

11. Further Steps

We will undertake an annual review of the effectiveness of the steps we have taken to identify, assess and manage modern slavery risks in our business and supply chains, and will consider further improvements where required.

This statement relates to the financial year ending 31 August 2025 and sets out the steps taken by Luddon Construction Limited during that financial year to prevent modern slavery and human trafficking in its business and supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

This statement is published on our UK website and is accessible from a prominent link on our homepage.

This statement has been signed on behalf of the Board by the Joint Managing Directors.

Signed

A handwritten signature in cursive script that reads 'Allan Randall'.

Allan Randall
Joint Managing Director
Date: 21st July 2026

Signed

A handwritten signature in cursive script that reads 'Alex Morrison'.

Alex Morrison
Joint Managing Director
Date: 21st July 2026