



Modern Slavery and Our Business – Yearly Statement 2024/25

Introduction from the Board of Directors

We the Board of Directors of the Stephenson Group of Companies are committed to improving our practices to combat slavery and human trafficking both within our business and that of our supply chain.

Organisation's structure

We are a Development & Construction Contractor in the construction sector based wholly in the UK and operate in England, Scotland, and Wales. Our Head Office is in Horsham, West Sussex. We also undertake various developments, and this statement incorporates those developments.

Our business

Our business is organised into three primary business sections:

- Concrete frames
- Ground works
- Residential Housing Developments

Plant Hire: business to business construction equipment purchase and hire services are undertaken by our yard facility in Llandow, South Wales.

All the above sections are provided with and supported by staff operating within the administrative sections at Horsham, Glasgow, and Bridgend.

Our supply chains

Include but are not limited to:

- Sub-contractors who engage specialist trades personnel
- Labour Agencies
- Suppliers of materials including:
 - Timber products from sustainable sources
 - Reinforcing steel
 - Natural aggregates and cement products
 - Above and below ground plastic building products
 - Personal Protective Equipment

Our policies on slavery and human trafficking

We are committed to ensuring, so far as we are able, that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Sub-contractors who are engaged by the Group must demonstrate a similar commitment to ensuring no modern slavery or human trafficking takes place within their own organisation and through-out their supply chains.

Our Code of Conduct, Corporate Social Responsibility (CSR) policies, and our supply chain transparency policy relating to procurement and sourcing, reflects our commitment to acting ethically and with integrity in all our business relationships and to implement and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business and our supply chain.



This will include requiring our supply chain to enter contracts which places them under contractual obligations to comply with requirements of the Modern Slavery Act (MSA).

Due diligence processes for slavery and human trafficking

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

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle blowers

Supplier adherence to our values 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 we have in place a supply chain compliance strategy which applies similar principals to that of our general policies and procedures.

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 our staff through the Supply Chain Sustainability School.

We also require and encourage our business suppliers to join the school and provide training to their staff and suppliers and providers.

Our effectiveness in combating slavery and human trafficking

We will use 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. We will undertake audits and inspections which focus on the Group's and our Supply Chain's compliance with the MSA. To this end all those involved in our Supply Chain must present a regular formal update outlining their continued compliance. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 30th September 2025.

A handwritten signature in black ink, appearing to read "Toby Hemsley".

Toby Hemsley

Managing Director

30th September 2024