



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights and it is a criminal offence under the Modern Slavery Act 2015. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and 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.

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.

We will communicate this policy and our expectations clearly to all suppliers, subcontractors and business partners and require written acknowledgement of compliance as part of onboarding and contract renewal processes.

Suppliers must cascade these requirements throughout their own supply chains and demonstrate how they ensure compliance at all tiers.

This policy applies to all businesses within Celtic Contractors, to subcontractors undertaking business on behalf of Celtic Contractors, and to all directors, colleagues and representatives of any of the above entities, whether permanent, temporary or contract (Celtic Contractors Personnel), within all areas and functions. Celtic Contractors Ltd also expects its business partners, suppliers and contractors to abide by the terms of this policy.

RESPONSIBILITY FOR THE POLICY

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Integrate Management System Manager, Florin Constantin Cristat has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Celtic Operations Director, Sinead Malik at sinead@celticcontracts.co.uk.

COMPLIANCE WITH THE POLICY

- You must ensure that you read, understand and comply with this policy.



- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- You must notify your manager or the compliance team as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.
- If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Operations Director.
- We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

IMPLEMENTATION METHODS

To ensure this policy is effectively embedded throughout Celtic Contractors and its supply chain, the following implementation measures will be applied:

1. Supplier Onboarding & Due Diligence

All Celtic new suppliers and subcontractors must complete a modern-slavery questionnaire before approval.

Suppliers must sign a declaration confirming compliance with this policy and the Modern Slavery Act 2015.

High-risk suppliers may be required to provide additional documentation, such as labour-practice audits or third-party certifications.

2. Ongoing Monitoring & Audits

Celtic Contractors will conduct periodic audits of suppliers, including unannounced checks where appropriate.

Suppliers must provide evidence of their own monitoring processes and corrective actions.

Any supplier failing to meet required standards must implement an improvement plan within a defined timeframe.

3. Training & Awareness

Mandatory annual training will be provided to all employees involved in procurement, contract management and site operations.

Suppliers will be provided with guidance materials and may be required to undertake training where risk levels are high.

4. Contractual Controls

All Celtic supplier contracts will include modern-slavery clauses, audit rights and termination provisions for non-compliance.

Suppliers must ensure that equivalent clauses are included in their own contracts with subcontractors.



5. Reporting & Escalation

A clear escalation pathway will be maintained for reporting concerns within the supply chain. All reports will be investigated promptly, with outcomes documented and reviewed by senior management.

Reporting and Escalation Procedure

Reporting a Concern

Any Celtic employee, supplier, subcontractor, agency worker, contractor, consultant, or business partner who identifies, suspects, or becomes aware of a potential or actual case of modern slavery, human trafficking, forced labour, child labour, or any other unethical labour practice has a duty to report the concern immediately.

Concerns should be reported through one of the following channels:

- The Line Manager;
- The Integrated System Manager, Florin Constantin Cristat;
- The Contracts Director, Martin Stripe or Mark Avis;
- The Operations Director, Sinead Malik; or
- The Company's Whistleblowing Procedure, where confidentiality is required.

Reports should be made as soon as reasonably practicable and should include any relevant information or evidence available at the time.

Initial Assessment

Upon receiving a report, the Manager or Director will conduct an initial assessment to:

- review the information provided;
- gather any additional relevant facts;
- assess the credibility of the allegation; and
- determine the potential level of risk to individuals and to the business.

All reports will be treated confidentially and documented in accordance with the Company's document control and record retention procedures.

Assessment Outcome

Where the initial assessment concludes that the concern is not credible or there is insufficient evidence to support the allegation, the case will be closed. The reasons for the decision will be fully documented and retained for audit purposes.

Where the concern is considered credible, the matter will be escalated immediately to the Operations Director or Managing Director for formal investigation.

Investigation

A formal investigation will be undertaken proportionate to the nature and seriousness of the concern. This may include:

- engagement with the supplier or subcontractor concerned;
- review of relevant documentation and evidence;
- interviews with relevant personnel;
- additional due diligence activities; and
- site inspections or supplier audits where appropriate.

The investigation will determine whether the Company's Modern Slavery Policy, contractual requirements, or applicable legislation have been breached.



Corrective Actions

Where non-compliance is identified, the supplier or relevant party will be required to implement an agreed Corrective Action Plan within specified timescales.

Celtic will monitor progress to ensure the corrective actions are effectively implemented and sustained. Follow-up reviews or audits may be carried out to verify compliance.

Failure to Comply

If a Celtic supplier or subcontractor fails to implement the required corrective actions, or where serious or criminal breaches are identified, Celtic Contractors Limited may:

- suspend the supplier from the approved supplier list;
- terminate existing contracts in accordance with contractual provisions;
- notify relevant regulatory or law enforcement authorities where criminal activity is suspected; and
- take any additional action necessary to protect workers and the Company.

Case Closure and Record Keeping

Once the investigation has concluded and any required actions have been completed, the case will be formally closed by the IMS Manager.

All records relating to the report, investigation, findings, corrective actions, and final outcome shall be securely retained in accordance with the Company's document retention requirements and made available for internal audits, management reviews, and external assessments where appropriate.

Lessons learned from investigations shall be reviewed during Management Review meetings to support continual improvement of the Company's Modern Slavery Management System.

COMMUNICATION AND AWARENESS OF THIS POLICY

Our zero-tolerance approach to modern slavery must be communicated to all employees, suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

This policy will be distributed to all suppliers annually, along with any updates, and suppliers will be required to confirm continued compliance.

Key elements of this policy will be included in supplier handbooks, tender documents and procurement frameworks.

NON-COMPLIANCE / BREACHES OF THIS POLICY

Celtic Contractors Ltd will take firm disciplinary action in cases of modern slavery practices. These will very likely lead to dismissal or the termination of contract of involved parties. Furthermore, cases of such practices may be reported to the relevant public authorities, which may result in criminal prosecution.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



REVIEW

The Anti-Slavery and Human Trafficking Policy will be reviewed at least annually as per Celtic Integrated Management System and approved by the Company's Board of Directors. This Policy will be used to inform our Statement on Slavery and Human Trafficking which will be published yearly.

A handwritten signature in black ink, appearing to read 'Jon Whyte', located above the printed name.

Jon Whyte
Managing Director
Celtic Contractors Ltd

Date: 10.07.2026