



Group Policies

Modern Slavery Policy

In accordance with section 54 [Transparency in Supply Chains] of the Modern Slavery Act 2015

Commitment

The Group acknowledges and accepts its obligations under the Modern Slavery Act 2015 and is committed to eliminating any acts of modern-day slavery from within its own business and from within its supply chains.

The Group is committed to upholding the highest ethical standards throughout all aspects of its business, which includes respecting and safeguarding the human rights of all stakeholders. This commitment is based on the belief that business should be conducted honestly, transparently, fairly and legally. We expect all employees, suppliers, contractors, and other stakeholders to share our commitment to high moral, ethical and legal standards.

The Group will ensure transparency within the organisation and with suppliers of goods and services to the Group.

Organisational structure and supply chains

The Group is a public limited company listed on AIM and operates via its group subsidiary companies within the construction sector. The Group does not operate any overseas branches, nor does it currently conduct operations outside the United Kingdom. The Group considers its risk of exposure to modern slavery as low.

The Group relies on its supply chains in order to undertake steel and other related supplies.

The Group's supply chains for both goods and services are predominantly composed of United Kingdom based entities and the majority of these have long-standing relationships with the Company.

On occasion, the Group (and those in its supply chain) will source goods and services from overseas. Slavery and human trafficking enquiries are made with any new supplier engagements. This due diligence process incorporates a review of the controls undertaken by the supplier and contractual documentation issued by the Group includes confirmations from suppliers that they comply with the Modern Slavery Act 2015.

The Group will not support or deal with any business knowingly involved in child labour, slavery or human trafficking.

Approval and Implementation

This statement has been unanimously approved by the Company's Board of Directors.

The directors and senior management shall take responsibility for implementing this policy statement. They are committed to providing adequate training and investment to ensure that trafficking is not taking place within the organisation or within its supply chains.

This policy statement is published on the Company's website and reviewed on an annual basis.

M Smith
Chief Executive
Billington Holdings Plc

Date: January 2026
Review Date: January 2027