

Slavery and Human Trafficking Statement

C3 Construction Limited · Financial year ended 30 September 2025

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of C3 Construction Limited for the financial year ended 30 September 2025. It sets out the steps taken during that financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains or in any part of our own business.

1. Our structure, business and supply chains

C3 Construction Limited is a groundworks and civil engineering contractor operating in the United Kingdom, with an annual turnover in excess of £100 million. We work predominantly across the Midlands and also undertake projects further afield.

We work principally as a subcontractor to housebuilders, developers and main contractors, and as principal contractor on some projects. Our work includes groundworks, drainage, civil engineering and remedial works.

During the financial year our workforce comprised an average of 113 directly employed personnel, consistent with our audited financial statements for the year, together with approximately 640 indirect personnel, being labour-only subcontractors, agency workers and workers engaged through other intermediaries. The proportion of indirect labour is characteristic of our sector and is central to how we assess our modern slavery risk.

Our supply chain consists principally of subcontractors providing labour and specialist trades, labour providers and agencies, plant hire companies, and suppliers of construction materials. The majority of our supply chain is based in the United Kingdom.

2. Our policies

We maintain a Modern Slavery and Human Trafficking Policy which applies to all employees, labour-only workers, agency workers, subcontractors and suppliers. It is supported by our Whistleblowing, Ethics, Right to Work and equality policies. These are available to all staff and are issued as part of company induction.

Our policies are approved by the Managing Director and reviewed at least annually.

3. Risk assessment

We recognise that construction is identified by the Gangmasters and Labour Abuse Authority as a sector carrying a heightened risk of labour exploitation. We assess that risk within our business concentrates in the engagement of agency and labour-only workers, and in the lower tiers of our supply chain, rather than in our directly employed workforce.

We also recognise that the absence of an identified case does not by itself demonstrate the absence of risk, and may instead indicate that due diligence needs to go further.

4. Due diligence and the steps taken during the financial year

During the year ended 30 September 2025 the following steps were taken:

- Pre-employment checks confirming identity, references and qualifications, and that applicants are operating as free agents.
- Right to Work checks in accordance with Home Office requirements, with temporary permissions monitored and rechecked before expiry. We recognise that Right to Work checks establish entitlement to work and do not by themselves identify modern slavery, as victims frequently hold valid documents.
- Verification that wages are paid directly into an account held by the worker, with payment of several workers into a single account treated as a warning sign and investigated.
- A formal supplier and subcontractor approval process. Subcontractors were approved through PQS, ourSSIP-accredited pre-qualification provider, and were then subject to final vetting by our SHE Compliance Manager before being added to the Approved Contractors List.
- Compliance declarations issued to subcontractors during the year required them, among other things, to maintain a modern slavery commitment statement even where they fell below the £36 million turnover threshold, to ensure their own supply chain complied with the Modern Slavery Act, to conduct proportionate due diligence, to verify the eligibility of their workers to work in the UK, to report modern slavery concerns to our SHE Compliance Manager, to provide information and training to their workers, and to give due consideration to signing the Gangmasters and Labour Abuse Authority Construction Protocol.

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- Declarations also required subcontractors to disclose any finding against them under the Modern Slavery Act, or under sections 15 or 21 of the Immigration, Asylum and Nationality Act 2006, within the previous three years.
- Additional scrutiny of goods and materials sourced from outside the United Kingdom and the European Union, which we treat as higher risk.
- Where labour was engaged through an agency or labour provider, confirmation that no work-finding fees were charged to workers and that workers retained their own identity documents.
- Right to work verification extended to workers supplied by our subcontractors.

5. Raising concerns

Employees, workers and those in our supply chain may raise concerns with a line manager, with a Director, or through our Whistleblowing Policy. No one raising a genuine concern will suffer detriment.

Concerns may also be raised outside the company, and should be where a person may be at risk:

- Modern Slavery Helpline — 08000 121 700. Confidential, and anonymous reports are accepted.
- Gangmasters and Labour Abuse Authority — 0800 432 0804 or intelligence@gla.gov.uk.
- Police — 999 where a person is in immediate danger, or 101 otherwise.

Potential victims can be referred for support through the National Referral Mechanism. Our staff are instructed not to confront a suspected exploiter or attempt to investigate themselves, as this may place a victim at greater risk.

6. Training and awareness

The Modern Slavery and Human Trafficking Policy is issued to all workers at induction and is available through our document system. Employees are reminded of their duty to report concerns. Managers and supervisors receive briefing on the policy and on the indicators of labour exploitation.

7. Effectiveness

No instances of modern slavery or human trafficking were identified within our business or supply chain during the financial year, and no concerns were reported to us. We do not treat this as evidence that no risk exists.

We measure the effectiveness of our approach by reference to the completion of Right to Work and pre-employment checks, the proportion of subcontractors approved and vetted before mobilisation, the currency of compliance declarations held, and the number of concerns raised and how they were resolved, including a nil return.

8. Further steps

We have identified the following steps for the current and following financial years:

- Review our subcontractor compliance declarations to ensure that modern slavery, child labour and equality requirements are set out in full, and reissue them to our supply chain.
- Introduce a documented modern slavery risk assessment covering our own operations and our supply chain, reviewed annually.
- Extend structured awareness training to site supervision, who are best placed to recognise the indicators of exploitation on site.
- Give consideration to signing the Gangmasters and Labour Abuse Authority Construction Protocol.
- Publish this and subsequent statements on our website within six months of each financial year end.

Approval

This statement was approved by the Board of Directors of C3 Construction Limited and is signed on its behalf by the Managing Director.


Chris McCathie
Managing Director
18th August 2026

Statement for the financial year ended 30 September 2025 | Issued 18/08/2026 | Next statement due for the year ending 30 September 2026