

## **MODERN SLAVERY ACT 2015 STATEMENT 2026**

McBains is a leading UK-based property and construction consultancy with operations across the UK and Greece, offering multi-disciplinary services across the whole of the construction industry.

McBains fully supports the UK government's objectives to eradicate modern slavery and human trafficking. We are committed to the highest ethical standards and sound governance arrangements and endorse a zero-tolerance approach to modern slavery and human trafficking in our business and supply chains.

This statement supplements our HR108 Modern Slavery Policy and sets out the activities and actions we have taken to identify, prevent and mitigate the risk of modern slavery and human trafficking within our operations and supply chains.

Our supply chains include subcontractors, sub-consultants, professional service providers and suppliers that support our operational and project delivery activities. We assess modern slavery risk by considering the nature of the services provided, the location of delivery, the use of labour in the supply chain and the controls operated by our suppliers.

### **Steps Taken**

We have:

- Undertaken risk assessments to determine our risk exposure;
- Introduced an HR108 Modern Slavery Policy;
- Communicated the policy and details of the Act to our staff and supply chain;
- Included a contractual requirement within our supply chain to comply with the Act; and
- Made training available to our staff.

### **Our Policies**

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

Our HR108 Modern Slavery 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 ensure that slavery and human trafficking are not taking place anywhere in our supply chains.

### **Due Diligence Processes**

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;

- Identify measures taken by members of our supply chain to mitigate the risk of slavery and human trafficking occurring;
- Protect whistleblowers.

## **Our Supply Chains**

Our supply chain supports both our project delivery and wider business operations. We expect all suppliers and service providers engaged by McBains to operate ethically, transparently and in compliance with applicable legislation.

We expect our supply chain to be:

- Fully compliant with the Act;
- Fully transparent, accountable and auditable; and
- Free from ethical ambiguities.

## **Supplier Adherence**

We have zero tolerance to slavery and human trafficking. To ensure those in our supply chain and contractors comply with our values and ethics, we maintain supplier compliance arrangements that include:

- Due diligence;
- Compliance reviews and audit;
- Contractual obligations.

Responsibility for supplier compliance, due diligence and related checks is shared across relevant members of staff, with input from colleagues who cover legal, audit and compliance, human resources and business development activities as part of their wider roles.

## **Our 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 mandatory training to all our staff.

## **Our Effectiveness**

We monitor the effectiveness of our approach by reviewing concerns raised, supplier due diligence outcomes, training availability and completion, compliance reviews, audit findings and any corrective actions required. We will implement rigorous investigations if any reports are made and will take appropriate remedial action where issues are identified.

During the next reporting period, we will continue to review our risk assessment processes, supplier due diligence arrangements, staff awareness and training, and the controls used to manage modern slavery and human trafficking risks across our 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 for the financial years ending 2022/2026 for the company and all its subsidiaries.

This statement has been approved by the Board of Directors and will be published on the McBains website.

**Signed by CLIVE DOCWRA - Managing Director**  
On behalf of McBains Ltd

Signed  
Date