Toureen Group

Modern Slavery and Human Trafficking Statement 2025-2026

The Toureen Group takes its responsibilities in respect of modern slavery and human trafficking seriously. We are committed to acting ethically and with integrity in all our business dealings and relationships. We fulfil all statutory obligations and ensure legal compliance and complete transparency in respect of our workforce engagements and relationships.

Modern slavery is a heinous crime and a violation of fundamental human rights. Its various forms also include servitude, forced and compulsory labour and human trafficking.

We are committed to playing our small part in eradicating this modern day scourge, which has been described as criminality hidden in plain sight. Government research recently concluded that it costs the UK economy £4 billion annually.

We present our 2025-2026 statement as required by section 54 of the Modern Slavery Act 2015. The Board of the Toureen Group endorsed this report at its meeting in October 2026.

As the Managing Director with this key responsibility, I am proud to present this public statement of our position. We fully intend this to be a living policy that informs our culture and development and it will be updated regularly.

It is also signposted from the home page of the Group's website www.toureengroup.co.uk

If you wish to ask anything about the content of this statement, I have provided my contact details below and I will be pleased to hear from you.

Toureen is a long-established UK construction group which incorporates several award-winning, specialist, in-house divisions. These deliver high quality projects and services to a wide number of prestigious clients. Our core services may be contracted singularly or combined to create increased value through integrated solutions. Our Group turnover in our latest accounts year exceeded £141 million with individual contract values ranging from £100,000 to £20 million.

The Toureen Group consists of the following limited companies; Toureen Contractors, Tilley and Barrett, Toureen Plant, Soil and Water Solutions and Toureen Build which specialise in different types of work e.g. major projects, groundworks, RC frameworks, retail and petroleum fit out, demolition and soil remediation.

All of these companies are covered by this Group Modern Slavery Statement. It can also be accessed from the home page of each individual company's website.

Our Supply Chain

Our commitment to the Modern Slavery Act is fully inclusive of our partnerships in our supply chain. Our procurement process normally uses services and materials from United Kingdom and European Economic area based businesses.

The nature of our activities means that we rely significantly on our supply chain. Our supply chain is not particularly complex but it does contain over two hundred and fifty organisations. Of course, we are therefore limited in the level of verification we can undertake – particularly in respect of items emanating originally from secondary sources.

As one element of our procurement policy, we undertake due diligence with suppliers. We attempt to ascertain that no product/material/service we purchase or labour used has been tainted by slavery, exploitation, coercion or human trafficking. Our ability to verify their assurances is fairly limited. If we discover infringements or have reason to disbelieve assurances we receive, we will, of course, review our relationship with such suppliers.

We have three categories of material and product providers; preferred, strategic and client specific (where we are given bespoke orders from clients for specific materials as part of the tender to fulfil).

We have long standing transactional histories with our preferred suppliers, some as long as thirty years. Only preferred suppliers from our central database can be authorised by our Procurement team. Around eighty percent of our materials and products are sourced through a nominal number of preferred suppliers. These suppliers provide materials such as concrete, sand, timber products and steel.

Timber products are sourced through UK based companies who adhere to the Forest Stewardship Council (FSC). Plywood is also sourced through UK based companies with sustainable sources and are aligned to the Programme for the Endorsement of Forest Certification (PEFC).

Where Clients/the main Contractor order bespoke materials we undertake specification due diligence process, whereby we only use UK and EU companies who may then source products and materials as contractually required by the tender from around the world.

We also utilise strategic suppliers for product and materials only. These suppliers would also not be authorised to provide labour services. These suppliers usually provide 'one off' materials or products on an ad hoc basis which could be transactions made in UK high street shops or via online websites such as Amazon. Not all suppliers offer a credit facility, so strategic suppliers form an important part of the procurement process.

We annually review our procedures with our supply chains in terms of assessing and managing their levels of risk. We have also restricted the number of our personnel who have the responsibility to make and authorise purchases on our behalf of the business, thereby increasing internal accountability.

Labour forms a central pillar to our ability to undertake construction related activities. We are committed to ensuring there is no slavery or human trafficking within any part of our business or supply chains. We aim to achieve this through our recruitment policies and procedures and supplier due diligence processes.

During our investigations we have not identified any significant risks of modern slavery or human trafficking within areas of our organisation or its supply chain. We would describe our overall risk level as low.

We take the following steps to reduce our risk levels:

Directly employed

- Provide successful candidates with a written offer letter before they start work which states that their offer of employment is subject to the production of appropriate documentary evidence confirming their right to work in the UK
- Successful candidates must produce before their start date or on the morning of their start date their passport (original documents only, no photocopies) in person. In addition, in order to comply with the Asylum and Immigration Act 1996 requirements, evidence of the right to reside and work in the UK, including work permits and visas is sought from all successful applicants and checked by trained staff

Sub-contractors and labour only agencies

- Where we engage with sub-contractors or labour only agencies, they must satisfy us contractually that their own staff have the right to work in the UK. We also require sub-contractors to attend our full company induction before they attend our premises, office or construction site. Our induction includes a safety briefing, qualifications check, identification and verification of their right to work credentials.

Part of the onboarding process for all suppliers, sub-contractors and agencies, we also require the completion of SHEQ assessment which questions what policies the given company has in place relating to modern day slavery.

Due to changes in immigration law we have appointed an external immigration specialist to provide assistance with matters relating to immigration and adherence. We use Government websites to verify candidates work to right status. https://right-to-work.service.gov.uk/view/share-code. A number of key personnel have attended right to work training provided by a third party to ensure they are fully aware and complaint with the latest requirements.

Furthermore, we utilise a passport scanner at company inductions to read codeline data from passports to verify authenticity.

We annually undertake refresher briefings to all our workforce to ensure that they are aware of Modern-Day Slavery and how it can be recognised and reported. Personnel are also made aware of Anti Slavery Day each year. Refresher briefings were carried out the 17th Sept 2026.

We also operate due diligence provisions in respect of our own operations. Any area of our activity which carries a significant risk of modern slavery or human trafficking is subject to a specific risk assessment.

Our Compliance team have undertaken a risk assessment in the last 12 months on the above processes and determined the risk to our business model as low and did not lead to the discovery of any modern slavery/human trafficking issues.

We are committed to monitoring and maintaining our low risk e.g. through increasing awareness of slavery and human trafficking issues. This includes utilising our company communication provisions e.g. toolbox talks.

We operate a legally compliant, planned approach to procurement and payment. We also ensure that our organisation and its staff observe the provisions of the Bribery Act 2010.

We acknowledge that seasonal work can present particular risks; especially where migrant labour is used. This is a no risk area for our organisation as we do not utilise any seasonal migrant workers.

In terms of our suppliers, we encountered no examples of modern slavery/human trafficking in the past 12 months. We have a zero tolerance to Modern Slavery breaches. We would not work with suppliers who infringe our principles. Should we discover infringements, we would terminate their contract.

One of the most important ingredients of a successful business is undoubtedly its employees. We have already commented on our commitment to legally compliant terms and conditions of employment. We uphold the highest standards in our human resources policies and practices.

You can view our Equal Opportunities, Recruitment and Promotion Policy here.

Equal Opportunity Policy

Our recruitment and promotion policy enshrines a modern slavery and human trafficking guarantee. No member of staff is subject to forced labour or coercion: every member of staff enjoys 100% legally compliant employment.

We provide clear guidance to staff about tackling bribery and corruption. We operate specific provisions through which they can confidentially report any concern or "blow the whistle". We promote equality and diversity and have adopted measures to deal with any instances of intimidation, bullying or harassment. All members of staff have access to our grievance procedure.

You can view our Bribery provisions here : Anti-Bribery & Corruption Policy

You can view our Whistleblowing policy here : Whistleblowing Policy

You can view our Bullying and Harassment policy here : Bullying & Harassment Policy

You can view our Grievance procedure here: Grievance Policy

Provisions such as these not only reflect our commitment to the highest employment standards; they can also play an important supportive role in our opposition to modern slavery and human trafficking.

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We have continued to cascade the awareness of modern-day slavery throughout the business through email communications and toolbox talk briefings. These are refreshed each year.

Signature _____

Managing Director

Date 12/10/2026

Next Review 11/10/2027

Contact Us on: 0208 424 7999