

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

This statement is made under section 54 of the Modern Slavery Act 2015 and sets out the steps Neilcott takes to prevent slavery and human trafficking in its own operations and supply chains. Neilcott operates a zero-tolerance approach to slavery, servitude, forced or compulsory labour and human trafficking. We recognise that the construction sector is particularly exposed to these risks through its use of temporary, migrant and subcontracted labour, complex supply chains and the procurement of certain products, components and materials.

Our expectations of employees, suppliers and subcontractors are set out in our Code of Conduct, which prohibits forced, bonded, indentured or trafficked labour and any harsh or inhumane treatment and requires our supply chain to meet the same standard.

We apply a proportionate, risk-based approach to modern slavery due diligence. The initial assessment is completed through our Pre-Qualification Questionnaire (PQQ), which includes modern slavery questions and asks suppliers to confirm whether they hold a modern slavery policy or equivalent arrangements. Where a PQQ response is missing, incomplete, unclear or inconsistent, the submission will not be accepted and will be returned for further information. Once the additional information has been provided, the response will be reassessed to determine the level of risk and whether further assurance is required.

Where a supplier or subcontractor is assessed as high risk, or where a higher-risk product, component, material or supply route is identified, the supplier will be asked to complete the Modern Slavery & Human Trafficking Due Diligence Questionnaire. This includes consideration of risks beyond labour used directly on our projects, including further tiers of the supply chain where reasonably practicable.

Completed assessments, questionnaires and associated reviews are used to identify, record and close out compliance gaps. Where products, suppliers or supply routes have already been reviewed and approved, this will be recorded on the relevant register. Neilcott also maintains a list of banned products, which must be considered during procurement and supply chain review.

We verify the identity and right to work of all our employees as part of the recruitment process and raise awareness of the signs of exploitation through site inductions, posters displayed in welfare areas, and regular team briefings. We also require all labour agencies we engage to carry out appropriate right-to-work checks on the workers they supply.

If we identify a suspected case of modern slavery, our first consideration is the safety and wellbeing of the potential victim. Where there is a risk of harm, we will contact the police. We will use the National Referral Mechanism and signpost the Modern Slavery Helpline and the Fair Work Agency and may suspend or cease trading with the company involved. All employees, subcontractors, suppliers and clients are encouraged to report concerns in good faith to senior leadership or the relevant authorities. This statement is approved by the Board of Neilcott Construction.

A handwritten signature in dark ink, appearing to read "DH".

David Huxley
Managing Director
July 2026

Useful links :

[National referral mechanism guidance: adult \(England and Wales\)](#)

[Fair Work Agency](#)

[Modern slavery & exploitation helpline](#)