

Modern Slavery and Human Trafficking Statement

This statement has been produced in accordance with Section 54 of the Modern Slavery Act 2015. It states the actions Gratte Brothers Group Limited has taken during the financial year ending 31 March 2025, with the aim of ensuring that modern slavery or human trafficking is not taking place within our business or our supply chain.

Our Business

Gratte Brothers Group Limited is a family-owned building services company which provides electrical and mechanical engineering and maintenance, security systems and food service solutions through the following operating companies; **Gratte Brothers Limited, Gratte Brothers Building Maintenance Services Limited, Gratte Brothers Security Management Limited, Gratte Brothers Catering Equipment Limited, Gratte Brothers Technical Services Limited** and **Customised Computer Software Group Limited**.

The Group operates from headquarters in London and five branch offices in Belfast, Chelmsford, Stevenage, Warrington and Worthing, as well as multiple sites across the United Kingdom and Ireland.

Policy in Relation to Modern Slavery & Human Trafficking

Gratte Brothers has a zero-tolerance approach to all forms of modern slavery and human trafficking including child labour within its business and supply chain and is committed to acting ethically and with integrity in all business dealings. The Company is also committed to freedom of association, and this is supported by our Ethical and Sustainable Procurement Policy.

Gratte Brothers respects all human rights including the Universal Declaration of Human Rights and the Ethical Trading Initiative ETI Base Code and therefore ensures minimum wages, hours and benefits for all its employees and supply chain to meet or exceed all local human rights legislation. These commitments ensure all employees and subcontractors are engaging in freely chosen employment.

Where staff have concerns around issues of human rights, forced labour, recruitment practices or exploitations, they are encouraged to report these concerns to management.

Due Diligence

The Company's primary area of risk is within its supply chain. The supply chain consists of material and equipment suppliers, trade sub-contractors, professional service providers and recruitment and labour supply agencies. The Company's aim is always to seek transparency within the arrangements it makes for labour employment and the sourcing of materials.

The Company's labour force consists of permanent employees, agency workers and trade subcontractors. The Company is a registered member of the JIB, BESA and JIBPMES organisations and complies with and ensures that labour supply agencies and labour-only subcontractors comply with the respective National Working Agreements.

As part of the Company's supply chain approval process for new trade contractors and/or suppliers, a pre-qualification questionnaire (PQQ) is issued where aspects of social and ethical values including modern

slavery and human trafficking are examined. The completion of this questionnaire allows the Company to identify potential risk areas with the supply chain. For existing trade contractor/suppliers a two-year re-approval process is in place. Scheduled second party supplier audits take place, along with regular individual engagement meetings and group forums with supply chain members.

The HR department have in place a Preferred Supplier List (PSL) of agencies offering labour supply and recruitment services which is reviewed on an annual basis. The Company conducts regular compliance audits of recruitment agency practices including organisational structure, accreditations, UK right to work checks, modern slavery, anti-corruption, minimum wage, wage calculations, occupational health and pension arrangements.

Assessment of Risk

The Company has mapped out its supply chain of goods and services to identify elements of works and materials or products that are sourced from outside the UK and Western Europe, especially high-risk countries as detailed within the Modern Slavery Index, as these suppliers may represent the highest level of risk to the Company.

Members of the HR, Procurement and Site Operations teams have received specialist training on preventing and tackling modern slavery to assist in identifying where potential high-risk companies may be engaged. The external training was delivered by Stronger Together and raises awareness of how to spot signs of modern slavery and how to approach modern slavery in supply chains.

The Group has a Risk Director to oversee and manage the level of risk exposure to the Company.

Steps Taken to Date

- The Company registered and completed a self-assessment using the Supplier Ethical Data Exchange (SEDEX) to identify and mitigate risks of slavery and human trafficking.
- Relevant staff from across the business have undertaken training relating to modern slavery. This includes staff from operational sites as well as relevant Group support functions.
- Modern Slavery questions were added to the Company's audit matrix checklist for supply chain members, and an audit programme was developed to include second party audits of Tier 1 trade contractors and PSL labour supply agencies.
- The Company has appointed an external verification specialist to undertake the supply chain approval process using the Common Assessment Standard (CAS). This assessment includes questions on corporate social responsibility covering modern slavery.
- The Company has conducted risk assessments on contractors based on their size, nature of work and amount of work carried out for Gratte Brothers, which was be used to identify key audit targets.
- The Ethical and Sustainable Procurement Policy is regularly reviewed and sets criteria for carrying out procurement activities.
- The Company has worked with an external eLearning organisation to provide a mandatory online training module on Modern Slavery awareness.

Training & Awareness

To minimise the risk of modern slavery within our business and supply chain, specialist external training has been provided to appropriate procurement, HR and operational staff. This continues to be reviewed and refreshed, as necessary.

There is a mandatory Modern Slavery awareness eLearning module designed for all employees and raises awareness of modern slavery risks and provides knowledge to identify and respond to potential issues. The module has been completed by all current permanent employees and is part of the onboarding process for new employees to be completed during the probation period.

Future Plans

The company plans to continue to manage the risk of modern slavery through the following activities:

- Improve communication to the workforce

to ensure relevant modern slavery awareness and information is provided and ensuring posters with modern slavery information is on display.

- Enhance the auditing of supply chain and PSL labour supply providers.
- Develop a set of Key Performance Indicators (KPIs) to measure and monitor the progress made by the Company.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and was approved by the Group Board on 18 September 2025

Signed: 

D Gratte
Group Managing Director
19 September 2025