

Annual Modern Slavery Statement

Introduction

Shepley Engineers is committed to the prevention of Modern Slavery and Human Trafficking and will not tolerate or condone any such identified act within any aspect of our business activities.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It sets out the activities undertaken by the Company in respect of the prevention of Modern Slavery and Human Trafficking and constitutes the Company's annual statement for the financial period 1st October 2024 to 30th September 2025.

During the reporting period, no incidents of modern slavery or human trafficking were identified within our operations or supply chain. We continue to monitor effectiveness through supplier reviews, training completion, and escalation processes. Potential risk areas include extended supply chains beyond Tier 1 suppliers and the procurement of goods or materials with overseas origin. These risks are mitigated through supplier due diligence, contractual controls, and ongoing review.

Organisational Structure

We provide a diverse range of specialist construction and engineering services in support of the creation and maintenance of assets for both public and private sector customers in the Energy Sector. Our work is conducted solely in the United Kingdom and delivered by a directly employed workforce, all of whom are fully eligible to work within the United Kingdom, and many are regularly subject to various levels of security vetting.

Shepley Engineers recruit either directly or via a limited number of reputable recruitment partners, who are required to successfully complete our supply chain due diligence process prior to being accepted as a recruitment partner.

We believe that no worker should pay for a job. The cost of the recruitment of any worker engaged by us will be borne by the Company, not the worker, and as part of our due diligence and risk identification processes, we ensure that our supply chain and recruitment partners also adhere to this principle.

Supply Chain

Given the nature of our organisational structure, model of directly employed work delivery and our use of a UK-based Supply Chain, we consider that any exposure to risk of Modern Slavery or Human Trafficking is extremely low. Should any risk exist, it is most likely to be within the extended Supply Chain. We work closely with our Tier 1 members of our Supply Chain in the identification of such risks to ensure these are addressed in an appropriate manner.

Contact Us.

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Modern Slavery Policy

We have implemented a comprehensive policy on slavery and human trafficking which is available upon request. This policy details our approach to the prevention of Modern Slavery and Human Trafficking, along with the processes used to support and deliver our commitment. The policy has been communicated to our Tier 1 Supply Chain partners for their information and action.

We operate a risk-based approach to the identification of Slavery and Human Trafficking, based on the location of the product or service, industry sector, supplier relationships and existing data held, supported by additional information and guidance obtained from, but not limited to, sources such as the Global Slavery Index, Corruption Perceptions Index and the US Department of Labour Lists of Goods and Suppliers.

Due Diligence and Identification of Risk

Our policy of direct employment is supported by robust processes which ensure that an individual's identity is confirmed and that they have a legitimate right to work in the United Kingdom. This approach, alongside right-to-work checks undertaken by our staff, minimises the risk of employing forced labour or individuals who may be subject to human trafficking.

Where we utilise labour-only subcontractors, we have introduced due diligence checks to ensure that, as a minimum, labour providers comply with our commitment to the prevention of Modern Slavery and that their recruitment processes contain no illegal labour practices.

Although our supply chain is primarily UK-based, modern slavery considerations form part of our supplier pre-qualification and contract award process, with suppliers required to confirm compliance with relevant legislation and our ethical standards. This supplier assessment process is now embedded as part of normal business practice.

Communication and Training

Shepley Engineers' commitment to the prevention of Modern Slavery and Human Trafficking emanates directly from our Board of Directors. Their leadership and commitment to this important social issue has been clearly communicated both internally to employees and externally to subcontractors and Tier 1 Supply Chain partners.

Employees have received awareness training in relation to Modern Slavery. In the last year, we have completed refresher training with the senior team and employees who have direct responsibility for the engagement of workers or management of supply chain matters. Our main procurement leads have also undertaken ethical procurement and supply training through CIPS, covering ethical sourcing, responsible procurement, living wage considerations, and ensuring workers involved in producing goods and services are treated fairly and work in safe, viable conditions.

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We have reviewed our supply chain management process, including the management of Modern Slavery, and believe our processes remain robust. We have implemented a league table to assess and track our top 50 companies by spend, enabling improved performance and risk evaluation. In the coming year, we propose to refresh our audit plan for these top 50 companies to ensure the information and records provided remain adequate and up to date.

We will utilise our annual statements to reaffirm our continued commitment and communicate this evolution, including the steps we have taken and will continue to take to deal with this socially important issue.

Approval of Statement

The Board of Directors have reviewed, accept and fully support this statement and formally approved it on 24th March 2026.



Gavin Jakubowski
Managing Director
Shepley Engineers Ltd

24th March 2026

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