

Modern Slavery Statement – Armstrong Rhead Limited

This statement is made pursuant to the UK Modern Slavery Act 2015 and sets out the steps that Armstrong Rhead Limited has taken and will continue to take to ensure that modern slavery or human trafficking is not taking place in our business or supply chains for the financial year ending 31 March 2026.

1. Organisation's Structure, Business and Supply Chains

Armstrong Rhead Limited is a building services engineering consultancy providing mechanical, electrical, public health and sustainability design services for buildings from feasibility and design stages through to project completion. The company operates across the UK and is based in Boldon Business Park, Tyne & Wear, England.

Our services include:

- Mechanical building services and HVAC design
- Electrical building systems
- Public health engineering
- Sustainable and low-carbon technology consultancy
- Technical surveys, energy appraisals and feasibility studies.

As a consultancy our direct workforce is small (approximately 16 employees) and primarily based in the UK.

Our supply chain includes:

- Software and IT service providers
- Professional subcontractors or specialist consultants engaged for specific tasks
- Office service suppliers (e.g., utilities)
- Training and professional development partners

These suppliers may be UK based or international.

2. Modern Slavery Risks in Our Business and Supply Chain

We recognise that risks of modern slavery and human trafficking can arise:

- Indirectly within supply chains where subcontracted services or imported software/services are sourced from countries with higher labour risk profiles.
- Through suppliers that may engage contingent labour, outsourced support staff or third-party maintenance technicians.

Given our business model the risk of direct modern slavery within our core consultancy services is considered low. However, we remain vigilant regarding our indirect supply chain and any labour-intensive services that support our operations.

3. Policies in Relation to Modern Slavery

We are committed to acting ethically and with respect for human rights. To reflect this commitment:

- Armstrong Rhead Limited has a Modern Slavery & Human Trafficking Policy which outlines responsibilities, reporting mechanisms, procedures for identifying and addressing modern slavery risks and provisions on ethical recruitment and staff welfare, ensuring all employees are recruited fairly and in compliance with UK employment law.
- Our Supplier Code of Conduct requires suppliers and partners to adhere to basic labour rights and to prohibit forced labour, child labour and other modern slavery practices.

- Our procurement terms include clauses that require compliance with UK modern slavery laws.
- We comply with UK employment law and relevant ethical recruitment practices for all our staff.

These policies demonstrate our commitment to preventing modern slavery and guide the steps we take throughout our business and supply chains.

4. Due Diligence and Risk Assessment

We conduct due diligence when appointing new suppliers, which includes:

- Checking supplier background and reputation
- Reviewing any publicly available third-party assessments
- Assessing the nature of services provided and associated labour risks.

Where a supplier is deemed higher risk based on geography or sector, we request additional assurances and documentation regarding labour practices.

As part of our due diligence, we take proportionate steps to map our supply chains. This includes identifying our Tier 1 (direct) suppliers, categorising them by the nature of services provided and considering the geographical locations in which those suppliers operate. As part of our due diligence, we maintain a combined Supplier Mapping and Modern Slavery Risk Assessment Register, detailing all Tier 1 suppliers, the nature of their services, locations, assessed modern slavery risk and mitigation measures applied. This register serves as both our supplier map and risk assessment for the reporting period. This approach enables us to identify areas of potential modern slavery risk and to apply a risk-based approach to due diligence, supplier engagement and ongoing monitoring.

Where suppliers are unable or unwilling to provide sufficient information to support proportionate modern slavery due diligence, we take a risk-based approach to mitigation. This may include increased scrutiny of publicly available information or where appropriate, reviewing alternative suppliers with stronger governance and transparency. During the reporting period, this approach has informed procurement decisions in relation to office equipment and consumables ensuring alignment with our ethical standards while maintaining business continuity,

We recognise that our purchasing practices can influence supplier behaviour. While our business is primarily consultancy-based and low-risk, we are mindful that unrealistic expectations or undue commercial pressure could contribute to labour exploitation. To mitigate this risk, we ensure that:

- Project deadlines are set realistically and communicated clearly
- Pricing and payment terms are fair and agreed in advance
- Changes to project scope or requirements are communicated promptly to allow suppliers to plan appropriately
- Procurement staff are trained to consider potential modern slavery risks when engaging with suppliers and to apply these principles consistently.

By actively managing these purchasing practices we aim to reduce the likelihood that our operations indirectly contribute to modern slavery in our supply chain.

Armstrong Rhead Limited will complete the NHS Modern Slavery Assessment Tool (MSAT) where required by clients or framework agreements. Outcomes from the MSAT are reviewed by senior management and used to inform supplier risk ratings, mitigation measures and continuous improvement actions.

We recognise that environmental, social and governance (ESG) risks are interconnected. As part of our supplier assessment process, we consider environmental risk exposure alongside modern slavery risk when reviewing supplier practices and approving suppliers.

5. Training and Awareness

We recognise the importance of ensuring that employees are aware of the risks of modern slavery and human trafficking and understand their role in preventing it.

We provide training to employees involved in procurement, supplier management and contract oversight to build awareness of modern slavery risks within supply chains and to support effective risk identification and management. Training includes:

- Recognition of potential indicators of modern slavery
- Understanding responsibilities under the Modern Slavery Act 2015
- Processes for reporting concerns internally and escalating issues where appropriate.

Training is delivered through a combination of informal briefings and guidance with refresher awareness provided periodically and when relevant to roles or changes in risk. Training and awareness activities are reviewed periodically to ensure they remain proportionate to the nature and scale of our business and continue to support staff capability in identifying and responding to modern slavery risks.

All staff involved in procurement and supplier oversight receive initial briefings on modern slavery risks, with refresher sessions scheduled annually or when significant changes in risk arise. Additionally, all staff have completed the NatWest Modern Slavery online module to supplement internal briefings and ensure awareness of current best practices.

6. Monitoring and Effectiveness

We monitor the effectiveness of our approach to preventing modern slavery through proportionate review processes and key performance indicators. These include:

- The percentage of key Tier 1 suppliers reviewed annually for modern slavery risk
- The inclusion of modern slavery and ethical labour expectations within supplier engagement and procurement processes
- The number of employees receiving modern slavery awareness training
- The number of modern slavery concerns raised, investigated and addressed.

To support ongoing oversight, we:

- Review supplier contracts on an annual basis
- Conduct internal reviews of procurement and supplier management practices
- Track and assess any concerns raised through internal reporting channels.

These indicators are monitored internally and used to assess progress and inform continuous improvement. No allegations of modern slavery have been reported in the reporting period. We remain committed to continually improving our processes and controls.

7. Future Commitments

Over the next 12 months we plan to:

- Strengthen supplier risk assessments with enhanced screening tools
- Incorporate modern slavery considerations into all supplier evaluations
- Update training materials and include refresher sessions for staff

8. Approval

This statement will be presented to the Board of Directors for approval and signature.

Director: Steve Robinson

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Dated: 20/04/2026

Director: Leigh Booth

LBooth

Dated: 20/04/2026

Modern Slavery & Human Trafficking Reporting Process

