

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Merit Industrialised Construction (“Merit”) and subsidiaries has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Merit has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Merit is a specialist modular construction company providing a complete solution to clients from concept design through to build, handover and validation of a facility. Merit has experience of:

- ✔ Design and build of high specification buildings;
- ✔ Design and build of specialist facilities including cleanroom projects, laboratory facilities, process systems, dry rooms, research & development spaces, particle accelerators and , sterilisation suites;
- ✔ Design, fabrication, installation, commissioning and validation of process systems;
- ✔ Design and build of modular solutions; and
- ✔ GMP validation including VMP, DQ, IQ and OQ.

We operate across regulated sectors including healthcare, pharmaceuticals, data centres, semiconductor and research environments, where ethical sourcing and compliance standards are critical.

Merit operates in the following sectors:

- ✔ Data Centres
- ✔ Healthcare;
- ✔ Pharmaceutical and biotechnology;
- ✔ Life sciences and research;
- ✔ Semiconductor and nanotechnology;

[Our high-risk areas](#)

We carry out projects throughout the UK, and we recruit some local labour. We utilise preferred agencies who are vetted through our supplier appraisal process and carry out a Modern Slavery Risk Assessment to identify and mitigate risk areas before staff are employed.

Potential risk areas include:

- ✔ Agency labour and temporary workforce arrangements
- ✔ Lower-skilled construction trades
- ✔ International material sourcing
- ✔ Logistics and transportation services

Risk assessments are reviewed periodically based on project location, labour profile, supply chain complexity and country-specific risk indicators.

Our risk management actions include:

- ✔ Use of approved labour agencies only
- ✔ Mandatory supplier onboarding assessments
- ✔ Site supervision and workforce monitoring
- ✔ Escalation procedures for suspected breaches
- ✔ Contractual rights to remove non-compliant suppliers
- ✔ Encouraging whistleblowing and confidential reporting across our supply chain

[Our policies](#)

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

All policies are reviewed periodically to ensure alignment with the Modern Slavery Act 2015 and evolving industry best practice. These include:

- ✔ **Anti-slavery policy.** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- ✔ **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- ✔ **Whistle blowing policy.** We operate a whistle blowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- ✔ **Code of business conduct.** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
- ✔ **Supply Chain Code of Conduct.** This policy sets out our expectations that our suppliers uphold the same business principles as Merit.

Modern slavery requirements are embedded within procurement, recruitment and subcontract management processes.

[Our suppliers](#)

Merit operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our policies forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- ✔ They have taken steps to eradicate modern slavery within their business
- ✔ They hold their own suppliers to account over modern slavery
- ✔ They pay their employees at least the national minimum wage / national living wage (as appropriate)
- ✔ We may terminate the contract at any time should any instances of modern slavery come to light

Higher-risk suppliers may be subject to enhanced review or additional evidence requests.

All of Merit's suppliers & subcontractors are expected to cascade modern slavery obligations throughout their own supply chains.

We also conduct practical actions as part of our contracts with suppliers & subcontractors, such as:

- ✔ Periodic supplier audits
- ✔ Site labour inspections
- ✔ Verification of payroll/payment practices
- ✔ Monitoring excessive overtime or unusual labour turnover indicators

[Training](#)

We conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. This includes:

- Recognising indicators of exploitation
- Ethical recruitment practices
- Reporting and escalation procedures
- Supply chain risk awareness

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Training is provided to:

- Procurement and buying teams
- Operational management
- HR and recruitment personnel
- Site management teams

Refresher training is also delivered periodically to procurement/buying teams to maintain awareness and compliance.

[Our performance indicators](#)

Merit reviews incidents, audit findings and supplier performance trends to identify opportunities for continuous improvement.

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- ✓ No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

We recognise that modern slavery risks evolve and therefore remain committed to strengthening transparency, accountability and ethical procurement practices throughout our organisation and supply chain.

For and on behalf of Merit

A handwritten signature in black ink, appearing to read 'A. Wells'.

Tony Wells
Chief Executive Officer
Date: 19/05/2026

Revision	Modifications	Reviewed by	Authorised by	Date
01	Second issue	Helen Thompson	Tony wells	19/05/2026
00	First issue	Helen Thompson	Tony Wells	12/01/2026