

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Financial year 1 July 2025 to 30 June 2026

Company	Chas Berger Ltd
Registered office	4th Floor, 4 Tabernacle Street, London, EC2A 4LU
Company number	00359611
Status	Board approved

1. Purpose and commitment

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and describes the steps taken by Chas Berger Ltd during the financial year from 1 July 2025 to 30 June 2026 to prevent modern slavery in its business and supply chains.

Modern slavery includes slavery, servitude, forced or compulsory labour and human trafficking. It may also encompass the worst forms of child labour and other exploitation of children. We are committed to acting ethically and with integrity in our business relationships and to developing effective systems and controls to identify, prevent and address modern slavery risk.

2. Our business, governance and supply chains

Chas Berger Ltd is a UK construction contractor delivering planned maintenance, refurbishment, retrofit, maintenance and fire-safety compliance services across London, the Southeast and the Midlands.

Our operations involve direct employees and may also involve agency labour, labour-only subcontractors, specialist subcontractors, consultants, professional advisers and providers of materials, plant, equipment, transport, waste management and other services. Our supply chains include construction materials, labour services, tools, personal protective equipment, site accommodation and professional services. They can extend through several subcontracting tiers and may include products manufactured or sourced outside the UK.

Overall responsibility for this statement rests with the Board. Day-to-day responsibility for managing modern slavery risk is shared by procurement and HR teams, recruiting managers and the commercial team who understand their duties and company expectations.

3. Policies and standards

During the reporting period, the following policies and procedures were in force and supported our approach to lawful, fair and ethical working practices:

- Modern Slavery Policy
- Recruitment & Right to Work procedures
- Whistleblowing procedure
- Equal Opportunities policy
- Health & Safety policy
- Supplier code of conduct
- Subcontractor approval process

- Procurement policy
- Disciplinary procedures

These documents set expectations for employees, workers, subcontractors and suppliers regarding compliance with applicable labour, employment, immigration, health and safety and human rights laws. Policies and procedures are shared with staff at induction and are available on SharePoint, which is accessible to staff. External subcontractors receive relevant policies and procedures through various channels including through the subcontractor order process.

4. Principal risks and risk assessment

We recognise that construction presents heightened risks because of labour-intensive work, temporary and agency labour, multi-tier subcontracting and the sourcing of some materials from higher-risk countries or sectors. During the reporting period, we assessed modern slavery risk.

The principal risk indicators considered were:

- temporary, agency and labour-only workforces, including recruitment through informal intermediaries;
- multiple tiers of subcontracting and limited visibility beyond direct suppliers;
- payment below legal minimums, excessive working hours, unlawful deductions or recruitment fees;
- retention of identity documents, restriction of movement or accommodation tied to employment; and
- materials or services sourced from countries or sectors associated with higher forced-labour risk.

The Company will improve supply-chain visibility, raise awareness of modern slavery risks and investigate and address any concerns identified.

5. Due diligence and action taken in 2025-26

During the reporting period, we took the following steps to identify and manage modern slavery risk:

- Supplier and subcontractor onboarding: Approved subcontractors are screened and agree to our Articles of Agreement.
- Labour providers and recruitment: Employees and agency staff provide Right to Work documentation prior to commencing their role. Recruitment agencies are approved by directors following a screening process.
- Monitoring and assurance: Those responsible within their roles monitor the process on a day-to-day basis.
- Corrective action: No issues have been identified; therefore, no corrective action has been required to date.

Where a concern is identified, our approach is to assess immediate safety, protect confidentiality where possible, preserve evidence and escalate to the appropriate internal lead. We will engage relevant authorities or specialist support where appropriate. Any commercial action will take account of potential harm to affected workers; termination will not be treated as the automatic response where it could worsen that harm.

6. Training and awareness

During 2025-26, relevant employees in Procurement, HR, and Management completed training in equality, diversity and inclusion, modern slavery, whistleblowing and safeguarding, covering indicators of exploitation, escalation routes and responsibilities.

Target audiences should include procurement and commercial staff, site managers and supervisors, contract managers, HR personnel and employees involved in appointing subcontractors or labour providers.

7. Speaking up and responding to concerns

Employees, workers, subcontractors and suppliers can raise concerns through line management, HR, through Safeguarding email or the whistleblowing procedure. Reports may be made without fear of retaliation and will be handled seriously and, so far as practicable, confidentially.

During the reporting period, no concerns were raised relating to modern slavery or labour exploitation. Where there is an immediate risk of harm or suspected criminal activity, concerns may be referred to the police, the Fair Work Agency or another appropriate authority or support organisation.

8. Measuring effectiveness

The Board reviewed the following indicators for the reporting period:

Measure	2025-26 result	Board commentary / action
Suppliers/subcontractors screened	100% screened during initial onboarding	Continue to monitor & enhance as required
Enhanced reviews or audits	N/A	Consider desktop audits and random checks on sites
Training completion	69.7%	Increase target audience and target 100% completion
Concerns and investigations	0 reported	Communicate Safeguarding email & reporting methods
Corrective actions	N/A	N/A

These measures will provide a baseline for year-on-year review.

9. Priorities for 2026-27

In the next financial year, we intend to:

- complete a review of supplier and subcontractor onboarding and embed proportionate modern slavery risk expectations;
- deliver refresher training or awareness briefings for relevant employees and site management teams;
- review standard contractual terms for subcontractors and labour providers and strengthen modern slavery obligations where appropriate;
- improve records of supplier due diligence, identified risks and corrective actions; and
- make reporting routes clearer and more accessible to employees, agency workers and subcontractor workforces.

Progress against these priorities will be reported in our next annual statement.

10. Approval and publication

This statement was approved by the Board of Directors of Chas Berger Ltd on 29 September 2026. It will be published on the Company's website, with a prominent link on the homepage, and will be reviewed annually.

Signed:  _____

Name: Ashley Rex

Position: Managing Director

Date: 19 October 2026