



Modern Slavery & Illegal Workers Policy

Dated: 17/03/2026

Introduction

This Modern Slavery and Illegal Workers Policy relates to actions and activities during the current year and shall be reviewed on or before 17th March 2027.

The statement sets down Phelan Construction Ltd.'s commitment to preventing slavery, human trafficking and illegal workers in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery, human trafficking or illegal workers in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational Structure and Supply Chains

This statement covers the business activities of Phelan Construction Ltd which are as follows:

Construction company whose primary activity is refurbishment and general construction in the Leisure, Hospitality, and local school industry.

The Company currently operates in the following countries:

- United Kingdom

Training

To ensure a good understanding of the risks of modern slavery, human trafficking and illegal workers in our business and supply chains, the Company requires all employees to attend a short training presentation where the company modern slavery training presentation is delivered within the first 2 months of employment.

Policy

Phelan Construction Ltd is committed to ensuring that there is no modern slavery, human trafficking or illegal workers in our business or our supply chains. This Statement affirms our intention to act ethically in our business relationships.

Illegal Workers

Phelan Construction Ltd carry out appropriate VISA, Passport and DOB checks to ensure all employees are entitled to work in the UK in accordance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006. Should a non-EU resident apply to work with us, as identified by pre-employment screening questions, a copy of their work visa and passport would be required. All necessary checks would then be made to ensure the person had the right to work in the UK and they have no immigration restrictions that prevent them from doing the work in question.

Should a potential employees' right to work in the UK be on a temporary basis, additional checks will be carried out to ensure that their documents have been renewed prior to them commencing employment to prevent a situation where their working rights would expire during their period of employment.

All related verified documentation is retained for a minimum of 2 years after the individual has ceased employment with Phelan Construction Ltd.

UK Government Prevention Strategy

Phelan Construction Ltd support the UK Government Strategy to help prevent terrorism.

Measures taken to help reduce the chance of a terrorist attack are by keeping an eye out for suspicious situations and reporting a suspicious situation by being vigilant and using emergency contact.

Due Diligence Processes for Slavery and Human Trafficking

Phelan Construction Ltd undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes the building of long-standing relationships with suppliers and making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier &/or invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Policy Review

This Modern Slavery and Illegal Workers Policy will be regularly reviewed and updated as necessary. The Company Director endorses this policy statement and is fully committed to its implementation.

Signed:

A handwritten signature in dark ink, appearing to read 'D. N. McGowan', written in a cursive style.

Daniel McGowan - Director