ACTIFORM LTD

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2026/27

Actiform Ltd is committed to conducting business ethically and responsibly and to preventing modern slavery, human trafficking, forced labour and exploitation within our own operations and supply chain.

We recognise our responsibilities under the Modern Slavery Act 2015 and are committed to maintaining appropriate systems, controls and working practices to identify, assess and manage modern slavery risks.

This statement sets out the steps taken by Actiform Ltd during the financial year ending 2026 to prevent modern slavery and human trafficking within our business and supply chain.

This statement has been prepared with reference to the six areas recommended within UK Government guidance: organisational structure and supply chains; policies; due diligence; risk assessment and management; measures of effectiveness; and training. GOV.UK

Our Organisation and Supply Chain

Actiform Ltd is a UK-based specialist in the design, manufacture and delivery of off-site modular buildings, operating from Mirfield, West Yorkshire.

Our activities include the design, manufacture, fit-out, delivery, installation and associated project management of modular buildings across a range of sectors.

Our supply chain includes organisations providing:

- construction materials and manufactured components;
- structural steel and associated products;
- mechanical and electrical equipment and services;
- doors, windows, internal finishes and specialist products;
- specialist subcontract labour and trades;
- transport, haulage and lifting services;
- temporary and agency labour where required; and
- professional and consultancy services.

We recognise that modern slavery risks can exist at different stages of complex construction and manufacturing supply chains, particularly where temporary or migrant labour, recruitment agencies, subcontracting tiers or imported materials are involved.

Our Policies in Relation to Modern Slavery and Human Trafficking

Actiform Ltd does not tolerate forced labour, bonded labour, indentured labour, involuntary prison labour, slavery or human trafficking within our own business or supply chain.

All employment within Actiform Ltd must be voluntary.

We will not knowingly use or support any arrangement involving the recruitment, harbouring, transportation, provision, receipt or obtaining of a person through force, fraud, coercion or deception for the purpose of involuntary servitude, debt bondage, slavery or similar exploitation.

We will not place unreasonable restrictions on workers' freedom of movement or their ability to enter or leave facilities provided by us.

Employees must retain access to their own identity documents, passports, work permits and driving licences except where temporary retention is legally required.

Actiform Ltd will not knowingly permit workers to be charged recruitment fees as a condition of employment. Where migrant workers are recruited, any recruitment arrangements must comply with applicable legislation and workers must be provided with clear written information regarding the terms and conditions of employment.

Workers must not be required to pay deposits, bonds or other fees to secure employment.

We expect our suppliers and subcontractors to uphold equivalent standards and comply with all applicable modern slavery, employment and human rights legislation.

Actiform Ltd also maintains procedures through which employees can report suspected ethical, legal or regulatory breaches relating to our operations or supply chain.

Our existing policy already contains these core commitments, including specific protections relating to forced labour, migrant workers, recruitment fees, identity documents and reporting concerns.

Due Diligence Processes

Actiform Ltd manages modern slavery risk through its procurement, subcontractor approval, supplier management and employment processes.

All subcontractors are required to complete a Pre-Qualification Questionnaire (PQQ) as part of Actiform's onboarding and approval process. The PQQ includes specific questions relating to Modern Slavery, enabling us to assess whether subcontractors have appropriate policies, controls and arrangements in place before they are approved to work with us.

Our wider due diligence approach includes:

- reviewing subcontractor responses to the PQQ prior to approval;
- requiring subcontractors and suppliers to comply with applicable modern slavery, employment and human rights legislation;
- considering ethical employment practices and labour arrangements as part of supplier and subcontractor management;
- reviewing relevant policies, declarations or supporting evidence where appropriate;
- monitoring the use of temporary, agency and migrant labour where applicable;
- investigating any concerns or suspected breaches brought to our attention; and
- requiring corrective action where a supplier or subcontractor does not meet the standards expected by Actiform Ltd.

Where a concern is identified, Actiform Ltd will assess the nature and seriousness of the issue and take proportionate action. This may include requesting further information, requiring corrective

action, increasing monitoring or, where appropriate, suspending or terminating the commercial relationship.

Risk Assessment and Management

Actiform Ltd recognises that the risk of modern slavery is not necessarily equal across all areas of its business and supply chain.

Areas that may present an increased risk include:

- temporary or agency labour;
- migrant labour;
- labour-intensive subcontracted activities;
- multiple tiers of subcontracting;
- recruitment practices involving third-party labour providers;
- goods or materials sourced from countries or sectors associated with increased labour exploitation risk; and
- supply chains where Actiform Ltd has limited visibility beyond the immediate supplier.

We assess modern slavery risk proportionately, taking into account factors including the nature of the goods or services being supplied, the geographical source, the use of labour intermediaries and the structure of the supplier's own supply chain.

Where a higher level of risk is identified, additional information, assurance or monitoring may be requested.

Employees are expected to raise any concerns relating to suspected exploitation, coercion, unsafe employment practices or other indicators of modern slavery.

Measuring the Effectiveness of Our Approach

Actiform Ltd recognises the importance of measuring whether the steps we take are effective rather than relying solely on policy statements.

We will monitor appropriate indicators including:

- the number and proportion of relevant employees completing modern slavery awareness training;
- the number of suppliers and subcontractors subject to relevant due diligence or compliance checks;
- modern slavery concerns reported within the business or supply chain;
- concerns investigated and outcomes recorded;
- corrective actions raised with suppliers or subcontractors;
- completion and closure of corrective actions; and
- any supplier or subcontractor relationships terminated as a result of serious ethical or employment concerns.

For the 2026/27 reporting period, Actiform Ltd will continue to improve the way in which these measures are formally recorded and reviewed.

Government guidance specifically recommends the inclusion of key performance indicators capable of showing whether the steps being taken are effective. GOV.UK

Training and Awareness

Actiform Ltd provides ongoing awareness and training relating to modern slavery and human trafficking so that relevant employees understand our expectations and are able to recognise potential warning signs.

Training and awareness are intended to help employees understand:

- what modern slavery and human trafficking are;
- common indicators of forced or exploited labour;
- risks associated with temporary, agency and migrant labour;
- the importance of responsible recruitment practices;
- supply-chain risks;
- how to raise a concern; and
- the responsibility of employees to report suspected unethical or unlawful practices.

Particular consideration is given to employees involved in recruitment, procurement, commercial management, project delivery and supplier/subcontractor engagement.

Our existing policy already commits Actiform Ltd to ongoing employee training on modern slavery and human trafficking. Slavery and Human Trafficking P...

Reporting Concerns

Employees, workers, suppliers and subcontractors are encouraged to report any concern relating to suspected modern slavery, forced labour, exploitation, unethical recruitment practices or human trafficking.

Concerns should be raised through the Office Manager.

All reports will be considered seriously and investigated where appropriate.

No employee should suffer detrimental treatment for raising a genuine concern in good faith.

Continuous Improvement

Actiform Ltd recognises that managing modern slavery risk is an ongoing process.

During future reporting periods we will continue to review and develop our approach, including:

- strengthening supplier and subcontractor due diligence;
- improving the recording of modern slavery checks;
- maintaining employee awareness and training;
- reviewing higher-risk elements of our supply chain;
- monitoring the effectiveness of corrective actions; and
- reviewing this statement annually.

Government guidance recommends that organisations demonstrate year-on-year progress and increasingly detailed reporting against the six areas of the statement. GOV.UK

Approval and Sign-Off

This Modern Slavery and Human Trafficking Statement relates to the financial year ending **2026.**

It was approved by the **Board of Directors of Actiform Ltd on 26 April 2026**.

It has been signed on behalf of the Board by:

S H Dransfield
Managing Director
Actiform Ltd

Date: 27th April 2026