



MYC GROUP

Modern Slavery and Human Trafficking Statement

Financial year ending 30 September 2025 · Document reference MYC041

Introduction and scope

This is the modern slavery and human trafficking statement of **MYC Group** for the financial year ending 30 September 2025. It covers the following companies, and the arrangements it describes apply across all of them:

- MY Holdings Group Limited
- MYC Group (UK) Limited
- MY Fab Limited
- MY Merchant Limited
- MY Contracts Limited
- MY Façades Limited
- MY MEP Ltd
- MY Interiors Limited
- MY Resource Limited

It sets out the steps we have taken to ensure that slavery and human trafficking are not taking place in any part of our business or our supply chains.

We do not regard construction as a low-risk sector, and we do not regard our own supply chain as exempt from the risks the sector carries.

Basis of this statement: it is made pursuant to section 54(1) of the Modern Slavery Act 2015 by MY Contracts Limited (company number 13097825), whose annual turnover is in excess of £36 million and which is therefore a commercial organisation to which the duty applies. It has been approved by the board of MY Contracts Limited and is made on behalf of each company listed above. Where a company within the group is itself an organisation to which section 54 applies, this statement is made on its behalf and approved by its board.

1. Our structure, our business and our supply chains

Structure

MYC Group is a privately owned group of companies incorporated in England and Wales, operating principally in the United Kingdom. EMWHY INT LTD is the ultimate parent company, and MY Holdings Group Limited is the holding company for the trading businesses. The group's registered office is at 5 Beauchamp Court, Victors Way, Barnet, London EN5 5TZ, and its principal operating address is Unit 4, Barn Way, Lodge Farm Industrial Estate, Northampton NN5 7UW.



Our business

The group delivers construction, contracting and associated specialist services to public sector and commercial clients. Our activities span the following areas:

Activity	Companies
Main contracting, construction and design and build delivery	MY Contracts Limited
Off-site fabrication and manufacture	MY Fab Limited
Façade design, supply and installation	MY Façades Limited
Mechanical, electrical and plumbing services	MY MEP Ltd
Interior fit-out and finishes	MY Interiors Limited
Materials supply and merchanting	MY Merchant Limited
Group payroll and shared services	MY Resource Limited
Group holding, management and shared services	MY Holdings Group Limited; MYC Group (UK) Limited

Our supply chains

Our supply chains reflect the structure of the UK construction industry and comprise:

- subcontractors engaged directly by us, and their own lower-tier subcontractors;
- self-employed operatives engaged under the Construction Industry Scheme;
- employment businesses, recruitment agencies and labour providers supplying operatives to our sites and our fabrication facility;
- manufacturers, merchants and distributors of construction materials, products and components, some of which originate outside the United Kingdom;
- plant, equipment and vehicle hire providers;
- providers of site services including security, cleaning, welfare facilities, catering and waste management;
- professional and support services including design consultants, IT providers and financial and legal advisers.



2. Our policies in relation to slavery and human trafficking

Our commitments are set out below. They apply across the group, are available to all staff, and are issued to supervisors and operatives. This statement supersedes all previous modern slavery policy statements issued by any company within the group.

Our commitments

- We will not tolerate slavery or human trafficking in our own operations or anywhere in our supply chains.
- No worker should pay a fee to obtain or keep work with us or on our sites. Where recruitment costs arise, they are borne by the employer, not the worker.
- We require our subcontractors, suppliers and labour providers to meet the same standard, and to be open with us about how they meet it.

Responsibilities

- The Board has appointed Mr Yoav Tal, Managing Director, with the responsibility and authority to oversee and drive our approach to modern slavery.
- It is the responsibility of the Personnel Manager to ensure that right to work checks are completed for every person employed or directly engaged by the Company before they commence work, irrespective of nationality or apparent origin, and that records of those checks are retained.
- Contract Managers are responsible for applying MYC's modern slavery due diligence requirements to subcontractors, labour providers and suppliers engaged on their projects, including monitoring compliance with our requirements and escalating concerns.

Raising a concern

- Any worker, subcontractor, supplier or member of the public may raise a concern about modern slavery, in confidence, with any manager or director, or by email to info@mycgroup.co.uk. Concerns may also be raised anonymously under our whistleblowing arrangements.
- Concerns can also be raised independently of us, through the Modern Slavery and Exploitation Helpline on 08000 121 700, the Unseen app, the Gangmasters and Labour Abuse Authority, or the police. We publish these external routes alongside our own at induction, because a worker may not feel able to use a channel controlled by an employer.
- No person raising a concern in good faith — whether employed by us, engaged through a subcontractor or agency, or working elsewhere in our supply chain — will suffer any detriment for having done so.
- Responsible Managers and Directors must immediately escalate any suspected modern slavery or labour exploitation in accordance with the reporting and remediation process at section 7. Where a criminal offence may have been committed, the matter will be referred to the police and/or Gangmasters and Labour Abuse Authority as appropriate.



This statement should be read alongside our related policies, including our whistleblowing policy, our equality, diversity and inclusion policy, our discrimination, bullying and harassment policy, our subcontractor pre-qualification arrangements, and our recruitment and right to work procedures.

3. Our due diligence processes

Our due diligence is applied at the point of engagement and throughout delivery, and is proportionate to the risk presented by the activity concerned.

Workers engaged by us

- Right to work documentation is verified for every person engaged by the Company before they commence work, and records of that verification are retained.
- Identity, qualification and competence records, including CSCS registration, are checked before site access is granted. Where electronic verification is available it is used. Where checks are made manually, documents are examined for signs of forgery, including clashing fonts, names overlaid on original text, and a photograph that does not resemble the holder.
- CSCS pass letters presented in place of a card are checked against the issuing record before access is granted.
- All operatives receive a site induction before starting work, at which their working arrangements, welfare facilities and route for raising concerns are explained.
- At induction we ask every worker how they found the job, whether they paid any fee to obtain it, and whether they have been charged for anything they did not expect. Any fee paid is treated as a risk indicator and acted on.
- Workers are paid directly into a bank account in their own name. We do not permit multiple workers to be paid into a single account, and we treat any such request as an indicator requiring investigation.

Payroll for the group is administered internally rather than through a third-party or umbrella provider, so payment records are available to us directly for the checks described below.

Checking for patterns across records

Since the end of the financial year covered by this statement, we have begun extending our arrangements so that worker and applicant information is held in a form that allows patterns across records to be identified and reviewed for indicators of third-party control:

- multiple workers sharing an address, bank account, emergency contact or next of kin;
- sequential or near-identical telephone numbers across a group of workers;
- the same date of birth appearing across documents that should differ;
- the same photograph appearing on documents for different individuals.

Where an anomaly is identified, site access is not granted until the position is understood. The anomaly is recorded and escalated for investigation, and no change to payment instructions is accepted until the worker's identity and account ownership have been verified.



Subcontractors, agencies and labour providers

- Subcontractors and suppliers are assessed before engagement through our pre-qualification process, which includes their approach to modern slavery, their own policies, and their arrangements for verifying the right to work of their operatives.
- Our subcontract and purchase order terms require compliance with the Modern Slavery Act 2015 and prompt reporting to us of any concern or incident.
- Employment businesses and labour providers are required to confirm that they operate lawfully, that workers are paid at or above the National Minimum or National Living Wage, and that no fee has been charged to the worker for finding or keeping work.
- Subcontractors are required to obtain our agreement before engaging a lower-tier subcontractor on our projects, and to apply equivalent requirements down the chain.
- Since the end of the reporting period, we have begun extending our pre-qualification and contract management arrangements so that subcontractors, agencies and labour providers monitor and report on recruitment practices and worker welfare, rather than simply confirming at the outset that a policy exists.

On site

- Site access and attendance records are maintained, and unfamiliar or unregistered workers are challenged.
- There is no informal route onto our sites. Any attempt to bring workers on outside the onboarding process results in entry being refused, and the incident is recorded and shared with neighbouring sites and contractors.
- Any substitute worker offered in place of a worker who cannot attend is onboarded in full before being permitted on site.
- We carry out unannounced checks that the individuals working on site match the identities recorded in the employment or subcontract records, including outside normal hours and during public holidays.
- Where one person accompanies a group of workers as their interpreter, we treat this as a risk indicator. We are establishing access to independent interpreters at short notice.
- Site teams are briefed to treat indicators such as a worker not retaining their own identity documents, a third party controlling their communication or movement, unexpected wage deductions, excessive working hours, poor living conditions or inadequate clothing/PPE as worker-welfare concerns requiring escalation.
- Concerns identified on site are escalated to the Managing Director and recorded, investigated and acted upon.

4. Where the risk lies, and how we assess and manage it

Construction is assessed by the Director of Labour Market Enforcement as one of the highest-risk sectors in the United Kingdom for labour market non-compliance, including a risk of slavery. The risk is not evenly spread across our business, and we have assessed where it is concentrated so that our effort is directed accordingly.

Our assessment considers the labour model and degree of subcontracting; worker vulnerability and employment conditions; country, geographic and product/category risk; supply-chain depth and transparency; existing controls; and our ability to use commercial leverage to improve conditions. We prioritise enhanced due diligence where inherent risk is higher or visibility through the supply chain is lower, rather than relying solely on the existence of supplier policies.

Where the risk arises	How we assess and manage it
Lower-tier subcontractors, where visibility reduces with each tier removed from us	Prior agreement required before a lower-tier subcontractor is engaged; flow-down of contractual obligations; site access records checked against expected labour
Labour agencies, employment businesses and umbrella payroll providers, where workers may be charged fees, have documents withheld, or be housed in tied accommodation	Pre-engagement assurance on lawful operation, pay rates and no worker-paid fees; verification that workers are paid into their own accounts; review of payment records for multiple workers paid into one account
Overseas-recruited and sponsored migrant workers, whose visa conditions may tie them to a sponsor and who may carry debt from visa, travel and accommodation costs	Right to work verification; questioning at induction about recruitment fees; induction material and reporting routes made accessible in the languages spoken on site
Self-employed and CIS operatives, whose employment status can obscure exploitation	Direct payment into the individual's own account; identity and competence checks; attendance records
Low-skilled and ancillary work — site cleaning, welfare, security, waste, demolition and clearance — which attracts less scrutiny than trades	The same induction, verification and reporting arrangements apply regardless of role; these activities are included in pre-qualification rather than treated as incidental purchases; unannounced identity checks are directed at them in particular
Manufactured materials and components with overseas supply chains, including steel, stone, timber, solar and electronic components, and personal protective equipment	Supplier pre-qualification covering modern slavery; preference for suppliers who can evidence their own due diligence; enquiry into country of origin where risk is indicated

Risk is reviewed at least annually by the Managing Director together with the management team, and reassessed when we enter a new market, engage a new category of supplier, or become aware of a concern.



5. Measuring our effectiveness

We have adopted the following performance indicators, which we consider appropriate to the size and nature of our business, and which we report to senior management as part of our management review:

Performance indicator	Measure
Right to work verification completed before a worker starts	Percentage of workers engaged with verification recorded in advance — target 100%
Subcontractor and supplier pre-qualification including modern slavery	Percentage of newly engaged subcontractors and suppliers assessed — target 100%
Modern slavery training for managers and directors	Percentage trained, and percentage current within the 12-month refresher cycle — target 100%
Modern slavery awareness at operative induction	Percentage of site inductions including modern slavery content — target 100%
Recruitment fee questioning at induction	Percentage of inductions at which the worker was asked how they found the job and whether a fee was paid — target 100%.
Worker record anomaly review	Number of reviews completed, anomalies identified, and anomalies resolved
Unannounced identity checks	Number carried out, including the number outside normal hours or on public holidays
Concerns raised	Number raised, number investigated, and number closed with action taken
Referrals made	Number of referrals to the police, the Gangmasters and Labour Abuse Authority or the Modern Slavery Helpline
Supply chain assurance	Number of subcontractors and suppliers asked to provide, or improve, their own modern slavery arrangements
Payment integrity	Number of instances identified of multiple workers being paid into a single account, and action taken

This statement establishes the baseline for these indicators. Performance against them will be reported in our statement for the following financial year, and we will report both what the figures show and what we have changed as a result.

We have identified no instances of slavery or human trafficking in our business or supply chains during the period covered by this statement. We do not treat that as evidence that no risk exists; it is the reason we have set out above how we would expect to detect it.

6. Training and capacity building

- Suitable and sufficient training about slavery and human trafficking is given to Responsible Managers and Directors, with refresher training provided every 12 months.
- All supervisors and operatives receive an overview of modern slavery and labour exploitation, worker rights and reporting routes; this statement and supporting awareness materials are made available to them.
- Modern slavery awareness forms part of site induction, so that every person working on our sites understands what exploitation looks like and how to report a concern.
- Managers responsible for procurement and for engaging subcontractors and labour receive additional briefing on supply chain due diligence and on the indicators of exploitation. Site managers, supervisors and anyone involved in bringing labour onto our sites receive the same briefing, because they are both the people positioned to notice the indicators and the people an exploiter will approach.
- Training records are maintained and are available as evidence of compliance.

How we communicate

When we communicate with operatives we use the language of labour rights and worker welfare rather than the language of modern slavery, because a person being exploited will often not recognise themselves as a slave but will recognise that their wages are being taken or that they are not free to leave.

- Training covers how to recognise the signs of exploitation, how to raise a concern, and the instruction not to approach a suspected victim directly.
- We identify the languages spoken on each of our sites. Since the end of the reporting period, we have begun translating site registration forms, induction material and worker-rights information into the languages most commonly spoken on our sites.
- Awareness material is provided in more than one format — induction, toolbox talk, poster and app — and includes survivor testimony on film. We use resources published by Unseen, the Gangmasters and Labour Abuse Authority and the Supply Chain Sustainability School.
- We brief workers on how to read a payslip, so that they can identify deductions that should not be there, and on their right to join or form a trade union.

7. If we identify exploitation: remediation and support

Where we identify or suspect that a person working on our sites is a victim of slavery or labour exploitation, our first obligation is to that person's safety.

- We do not approach the suspected victim directly, and we do not alert the person or organisation we suspect of exploiting them.
- An investigation is initiated by the Managing Director, and findings are documented and acted upon.
- We will as a minimum ensure referral into the National Referral Mechanism, and will involve the police or the Gangmasters and Labour Abuse Authority where a criminal offence may have been committed.
- Any wages owed to the worker are paid.



- Where a supplier or subcontractor is responsible, corrective measures may include contractual sanctions, a requirement to remediate, or removal from our supply chain.

8. Our priorities for the coming year

Over the coming financial year we will:

- establish the reporting routine behind the indicators in section 5, so that next year's statement reports figures;
- introduce periodic anomaly review across worker and applicant records;
- extend our pre-qualification requirements so that subcontractors, agencies and labour providers report on recruitment practice and worker welfare;
- translate induction and worker rights material into the languages most commonly spoken on our sites, and establish access to independent interpreters at short notice;
- formalise the detailed internal response plan supporting section 7, including responsibilities, escalation, safeguarding, evidence handling and worker support.

Approval

This statement has been approved by the board of MY Contracts Limited and is signed on behalf of MYC Group.

Yoav Tal

Yoav Tal

Managing Director, for and on behalf of MYC Group

Date: 30/01/2026