



FRANKHAM

## Modern Slavery Statement

Financial Year Ending 2026

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015.

Although Frankham Consultancy Group does not currently meet the statutory turnover threshold requiring publication of a Modern Slavery Statement, the Company has elected to publish this statement voluntarily as part of its commitment to ethical business practice and transparency.

This statement has been approved by the Board of Directors and signed by a Director.

### 1 Our Organisation

Frankham Consultancy Group is a UK-based professional consultancy providing multidisciplinary services across the built environment sector, including architecture, engineering, surveying and project management.

The Company operates primarily within the United Kingdom and delivers professional services to public and private sector clients.

### 2 Our Policies and Governance

Frankham operates a Modern Slavery Policy within its Integrated Management System (IMS). The policy reflects a zero-tolerance approach to modern slavery and human trafficking.

The Senior Management Team has overall responsibility for policy oversight. The policy and associated risk position are reviewed at least annually as part of the Company's IMS review cycle.

### 3 Risk Assessment

Frankham undertakes a proportionate assessment of modern slavery risk within its operations and supply chain, taking into account:

The professional nature of its services

- Its UK-based operations
- Workforce profile
- Supply chain structure

Based on this assessment, the risk within Frankham's directly employed workforce is considered low.

The Company recognises that risk may arise within supply chains. While the majority of Frankham's suppliers provide professional services within the UK, the Company remains alert to the potential for risk in subcontracted or outsourced services.



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### 4 Due Diligence and Supply Chain Management

Frankham operates a Supplier Approval Process designed to verify supplier legitimacy, legal status and professional competence.

The Company's standard terms and conditions require compliance with applicable statutory requirements and employment legislation.

Where suppliers operate in sectors or environments that may present elevated risk, additional enquiries may be undertaken where considered proportionate.

Frankham does not currently operate formal labour audits or tiered supply-chain monitoring programmes, reflecting the nature and scale of its professional services operations.

### 5 Training and Awareness

Awareness of modern slavery risks forms part of employee induction and management oversight processes.

Given the Company's current operating model and risk profile, formal role-specific modern slavery training programmes are not currently implemented. This position is reviewed periodically.

### 6 Reporting Concerns

Frankham encourages employees and associated persons to raise concerns regarding unethical practices.

The Company operates a Whistleblowing Policy and does not tolerate retaliation against individuals who report concerns in good faith.

Where appropriate, concerns may be referred to relevant authorities, including the National Referral Mechanism.

### 7 Continuous Improvement

Frankham is committed to reviewing its approach to modern slavery risk management annually.

As the business grows and supply chains evolve, the Company will consider whether additional measures are appropriate and proportionate.

Approved by the Board of Directors.

**Signed:**

Richard Chitty – Group Managing Director

**Director**

**Date:** 24<sup>th</sup> February 2026