

Modern slavery statement

Organisation

This statement applies to Martin Williams (Hull) Ltd (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year 2025 – 2026.

Organisational structure

Martin Williams (Hull) Ltd operates as a privately owned limited company based in the United Kingdom. The organisation functions from a centralised headquarters located in Burstwick, Hull, which serves as the primary base of operations for all administrative, management, and coordination activities. We also have workshops within the immediate area to the main site and a branch in Dumfries, Scotland.

The company is structured around several internal divisions that support its operational activities. These include:

- Senior Management and Governance
- Operations Division
- Engineering and Technical Services
- Health & Safety and Compliance
- Human Resources
- Finance and Administration
- Commercial / Sales and Customer Liaison

Martin Williams (Hull) Ltd is an independent entity. Strategic oversight is provided by Directors, who are responsible for governance, long-term planning, financial control, and statutory compliance. Operational management is delegated to departmental managers who report directly to the Directors.

The organisation’s operations are wholly based within the United Kingdom, with its registered office and all functional departments located at:

Ellifoot Lane, Burstwick, Hull, East Riding of Yorkshire HU12 9EF.

Locharbriggs Quarry, Dumfries, DG1 1QS

There are no offices or operational sites outside the UK. All organisational resources—including staff, equipment, and administrative functions, are coordinated from the Hull headquarters and the Dumfries Site.

Martin Williams (Hull) Ltd specialises in the build, repair and maintenance of Commercial Vehicles, supporting a range of industrial and commercial clients. The company’s activities typically include:

- Design and build of commercial vehicles.
- Accident Repair for all major insurance companies

- Mechanical Maintenance and Repair
- Paint

These services are provided year-round, and the organisation does not experience significant seasonal variation in demand. Work is project-driven, with activity levels dependent on client requirements rather than seasonal trends.

All labour supplied by Martin Williams (Hull) Ltd in connection with its operations is carried out within the United Kingdom. Employees are primarily based at one of the company sites but may also be deployed to:

- Client sites across the UK

The organisation does not send employees to carry out work in other countries.

Definitions

The Organisation considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include:

- Procurement of raw materials, such as steel, engineering components, and fabrication materials, sourced primarily from suppliers within the United Kingdom.

- Specialist equipment and tooling, acquired from domestic engineering suppliers and authorised distributors.
- Personal protective equipment (PPE) and site safety materials, purchased from UK-based safety equipment providers.
- Subcontracted technical services, where required, to support specialist engineering or project-specific operational needs.

The supply chain structure is relatively straightforward and primarily UK-based, although some first-tier suppliers may import raw materials or component parts from the European Union or internationally. Martin Williams (Hull) Ltd purchases most goods and services directly from established UK suppliers, some of whom may act as intermediary traders, meaning they hold further contractual relationships with lower-tier suppliers who manufacture or process the materials. As such, although the organisation maintains direct relationships with its first-tier suppliers, it acknowledges that its wider supply chain may extend beyond the United Kingdom through upstream production or distribution activities.

The organisation undertakes reasonable steps to understand the provenance of critical materials and maintains communication with suppliers to ensure compliance with relevant legislation, standards, and ethical sourcing expectations.

Martin Williams (Hull) Ltd does not currently have an agreement with any trade union in relation to collective bargaining for terms and conditions. No bargaining unit is established within the organisation, and all employment terms are determined directly between the company and its employees in line with statutory requirements and internal HR policies.

Potential exposure

Martin Williams (Hull) Ltd considers its main exposure to the risk of slavery and human trafficking to exist within its extended supply chain, particularly in areas where raw materials or engineering components may originate outside the United Kingdom. While the organisation's first-tier suppliers are predominantly UK-based and subject to strong regulatory standards, some may source steel, metals, or manufactured components from overseas locations where:

- Labour protections may be less robust
- Oversight of working conditions is more limited
- There is a greater prevalence of subcontracted or informal labour

This creates potential exposure in the upstream stages of the supply chain, particularly where first-tier suppliers act as intermediary traders who may have additional contractual relationships with lower-tier suppliers not directly visible to the organisation.

Beyond supply chains, Martin Williams (Hull) Ltd considers its overall exposure to slavery and human trafficking to be relatively limited. This is based on the following factors:

- The organisation operates solely within the United Kingdom

- The workforce consists of directly employed staff working under UK employment law
- No work is carried out overseas
- The company does not engage in high-risk sectors such as agriculture, hospitality, or low-cost manufacturing
- Subcontracted services are sourced primarily from reputable UK providers

Nonetheless, the company recognises its responsibility to remain vigilant. Martin Williams (Hull) Ltd has taken proactive steps to ensure that such practices do not occur within its own operations or within any organisation that supplies goods or services to it. These include:

- Engaging with suppliers to promote transparency
- Procuring from reputable UK-based suppliers with established compliance processes
- Monitoring supply chain risks related to raw materials or imported components
- Maintaining policies and standards consistent with the Modern Slavery Act 2015

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

Supplier Contract Reviews

- Reviewed and updated supplier contracts to include explicit termination clauses where a supplier is, or is reasonably suspected to be, involved in modern slavery or human trafficking.
- Ensured new contracts include strengthened compliance expectations relating to labour standards, human rights, and ethical sourcing.

Identification and Assessment of Supply Chain Risks

- Implemented measures to identify and assess potential risks within the supply chain, particularly where first-tier suppliers may import raw materials or engineering components from higher-risk regions.
- Evaluated suppliers' policies, certifications, and adherence to UK labour laws and ethical procurement standards.
- Required suppliers to disclose information about their own supply chains where relevant.

Due Diligence and Supplier Monitoring

- Conducted due diligence checks on new and existing suppliers, including reviews of their internal controls, labour practices, and modern slavery statements (where applicable).
- Prioritised working with reputable UK-based suppliers known for compliance with employment and human rights legislation.
- Maintained ongoing communication with suppliers regarding expectations of ethical labour practices.

Impact Assessments

- Undertaken assessments of the organisation's services to evaluate whether any activities could create or contribute to instances of modern slavery.
- Reviewed operational processes to ensure that all labour used—direct or subcontracted—is protected by safe working conditions, appropriate pay, and legal rights.

Action Planning

- Developed internal action plans to address identified or potential risks within the supply chain.
- Established procedures for escalating concerns, conducting further investigation where necessary, and taking corrective action if any supplier falls short of expected standards.

Embedding a Zero-Tolerance Approach

- Embedded a **zero-tolerance policy** toward modern slavery across all departments and levels of the organisation.
- Communicated expectations to staff, suppliers, and business partners that modern slavery, forced labour, and human trafficking will not be tolerated under any circumstances.
- Strengthened internal awareness and supplier engagement processes to reinforce this organisational stance

Ongoing Review and Continuous Improvement

- Committed to reviewing policies and supply chain controls regularly to ensure ongoing alignment with best practice and legislative requirements.
- Monitored industry developments and UK Government guidance to adapt the organisation's approach where necessary.

Key performance indicators

Martin Williams (Hull) Ltd has established a range of key performance indicators to help measure the effectiveness of its actions in ensuring that modern slavery and human trafficking are not taking place within its organisation or its supply chains. These KPIs focus on supplier compliance, internal controls, and the ongoing management of risk.

The organisation will monitor its performance against the following indicators:

Supplier Compliance and Due Diligence

- **Percentage of suppliers that have undergone modern slavery due diligence checks** before approval.
- **Percentage of existing suppliers reviewed annually** for modern slavery risks.
- **Number of suppliers required to provide updated policies or statements** relating to modern slavery each year.
- **Percentage of supplier contracts updated** to include termination clauses related to slavery or trafficking concerns.

Identification and Management of Supply Chain Risks

- **Number of supply chain risk assessments completed** each year, including reviews of first-tier and potential lower-tier suppliers.
- **Number of identified risks** and the speed/effectiveness with which corrective actions are taken.
- **Frequency of reviews of materials or components sourced from higher-risk regions.**

Internal Monitoring and Reporting

- **Number of internal audits** carried out to verify compliance with modern slavery policies.
- **Number of concerns, reports, or whistleblowing disclosures** received regarding potential modern slavery or unethical labour practices.
- **Time taken to respond to and investigate concerns** raised internally or externally.

Staff Awareness and Understanding

- **Percentage of employees receiving modern slavery awareness training**, particularly those involved in procurement, contract management, and supplier engagement.
- **Evaluation of training effectiveness**, measured through feedback surveys or post-training assessments.

Impact Assessments and Action Planning

- **Number of impact assessments undertaken** to review whether organisational operations could contribute to modern slavery risks.
- **Completion and review of action plans** created to address identified risks.
- **Evidence of continuous improvement**, such as strengthened controls, new procedures, or refined risk-assessment methods.

Zero-Tolerance Policy Implementation

- **Evidence of communication of the zero-tolerance policy** to staff, suppliers, and business partners.
- **Number of suppliers removed, suspended, or subject to corrective action** due to non-compliance with modern slavery standards.
- **Regular review and updates to internal policies**, ensuring alignment with best practice and legislative requirements.

Policies

Martin Williams (Hull) Ltd is committed to preventing modern slavery and human trafficking in its business operations and supply chains. This commitment is underpinned by a framework of policies that reflect the organisation's zero-tolerance approach to any form of forced labour, servitude, or human trafficking.

The organisation maintains and applies the following policies to support its stance on modern slavery:

- **Modern Slavery and Human Trafficking Policy**
This policy sets out the organisation's commitment to acting ethically and with integrity in all business relationships and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in its operations or supply chains.
- **Supplier Code of Conduct**
This defines the minimum standards expected of suppliers, subcontractors, and business partners, including compliance with applicable labour laws, prohibition of forced or compulsory labour, and respect for human rights throughout their own supply chains.
- **Recruitment and Employment Policy**
This ensures that all employees are legally entitled to work in the United Kingdom, are employed voluntarily, and are treated fairly and consistently in line with UK employment legislation.
- **Whistleblowing Policy**
This enables employees and third parties to report concerns, including suspected modern slavery or unethical labour practices, without fear of retaliation.
- **Health & Safety Policy**
This supports safe and lawful working conditions and reinforces the organisation's commitment to employee welfare.

These policies are reviewed periodically to ensure they remain effective, up to date, and aligned with legislative requirements and best practice. Policies are communicated internally and, where appropriate, made available to suppliers and business partners.

Training

Martin Williams (Hull) Ltd recognises that awareness and understanding are critical to effectively preventing modern slavery. The organisation therefore provides training to ensure employees understand the risks of modern slavery and their role in identifying and preventing it.

The organisation provides the following training:

- **Induction Training**
All new employees receive induction training that introduces the organisation's values, ethical standards, and zero-tolerance approach to modern slavery and human trafficking.
- **Policy Awareness Training**
Employees are made aware of relevant policies, including the Modern Slavery Policy, Whistleblowing Policy, and Supplier Code of Conduct, and how these apply to their role.
- **Targeted Training for Key Roles**
Employees involved in procurement, supplier management, contract management, and senior decision-making receive additional guidance on:
 - Identifying indicators of modern slavery
 - Assessing supply chain risks
 - Escalating concerns appropriately

Ongoing Awareness

Modern slavery awareness is reinforced periodically through internal communications, policy updates, and management briefings to ensure continued vigilance.

Training effectiveness is monitored through feedback, policy compliance, and management oversight, and is reviewed regularly to ensure it remains proportionate to the organisation's risk profile.

Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: 14th April 2026



Signed:

Print name: Nick Williams
Job Title: Managing Director
Date: 14.04.26