PERC Ltd – Modern Slavery Statement

1. Introduction

PERC Ltd has a zero-tolerance approach to modern slavery and human trafficking in our business and our supply chains. This statement sets out the steps we have taken, and will take, to prevent it.

The statement is made under section 54 of the Modern Slavery Act 2015 and covers the financial year ending **31 June 2025**. Section 54 applies by law only to organisations with a turnover of £36 million or more. PERC Ltd falls below that threshold and publishes this statement voluntarily, because our clients in the rail and construction sectors expect transparency throughout their supply chains, and because it is the right thing to do.

It should be read alongside our Modern Slavery Policy (P-RMS-POL12), issued by the Managing Director on 10 March 2026.

2. Our organisation and business

PERC Ltd is a small, privately owned electrical design, consultancy and installation contractor, founded in 2014 and based in South Wales. We work for clients across the UK in the rail and construction sectors.

Item	Detail
Registered name	PERC Ltd
Company number	9103783
VAT number	194 9536 55
Registered office	Unit 3, Palmerston Workshops, Barry, CF72 8NG
Managing Director	Darren Williams
Sectors	Rail (stations, depots, control centres, on-track) and construction (domestic, commercial, industrial)
Employees	7no staff

Our services include:

- Electrical design, installation, testing and maintenance to BS 7671
- Railway LV power, station lighting and power, signaling power, points heating, earthing and bonding, and cable theft mitigation
- EV charger, solar PV and energy-efficient lighting installations
- Fire detection, intruder alarm, CCTV and access control systems
- Supporting civils (bases, compounds, troughing and duct routes)

- Principal Designer duties under the CDM Regulations 2015, when appointed

Our workforce is made up of electrical engineers, designers & Installation electricians. At times we also use specialist subcontractors and agency labour to meet project demand. We hold RISQS, Constructionline, Once For All (SSIP) and ECS-recognised competencies, and our engineers are members of the IET.

3. Our supply chains

Our supply chain is mostly UK-based, but some of the products we install are made overseas where modern slavery risks are higher.

Supply category	Examples	Main source
Electrical materials	Cable, containment, switchgear, distribution boards, fixings	UK electrical wholesalers
Equipment and technology	EV chargers, solar PV panels, LED lighting, CCTV, fire and security systems	UK distributors and approved manufacturers
Sub-contractors	Specialist installers, civils, groundworks, testing	UK businesses
Labour	Agency electricians and labourers, rail-competent operatives	UK labour agencies
Plant, tools and PPE	Hired plant, tools, workwear and PPE	UK hire companies and suppliers
Services	Vehicles, fuel, accommodation, IT, training	UK providers

4. Our policies

Our Modern Slavery Policy (P-RMS-POL12) commits PERC Ltd to acting ethically and with integrity in all business dealings. It applies to everyone working for us or on our behalf, including employees, directors, agency and seconded workers, contractors, consultants and business partners.

The policy sets out that:

- The Managing Director has overall and day-to-day responsibility for the policy, its effectiveness and our internal controls
- Managers at all levels must make sure the people reporting to them understand and comply with it

- Our contracts include specific prohibitions on forced, compulsory or trafficked labour, and on anyone held in slavery or servitude
- We expect suppliers to hold their own suppliers to the same standards
- Employees who breach the policy face disciplinary action, up to dismissal for gross misconduct
- We will end our relationship with any supplier or partner who breaches it
- The policy is reviewed annually at the PERC Management Review Meeting

These related policies and procedures support it:

- Whistleblowing procedure
- Recruitment and right-to-work checks
- Health, safety and welfare policy
- Equality, diversity and inclusion policy
- Anti-bribery and corruption policy
- Supplier and subcontractor approval procedure

5. Due diligence

We check new workers, suppliers and subcontractors before we work with them, in proportion to the size of our business.

Our own workforce

- Right-to-work checks for every employee before they start, with original documents seen and copies kept
- Written contracts, pay at or above the National Living Wage, and pay into the worker's own bank account
- Checks on competence cards (ECS, Sentinel, CSCS) that confirm the identity of rail and site workers
- We never charge workers recruitment fees or hold their identity documents

Labour agencies

- We use only established UK agencies that confirm they carry out right-to-work checks and pay at least the legal minimum wage
- We watch for warning signs: several workers sharing one bank account or address, workers transported by a third party, or workers who seem controlled or afraid

Suppliers and subcontractors

- Subcontractors are approved before use, with preference for those holding Constructionline, SSIP or RISQS accreditation
- Our zero-tolerance approach is set out at the start of every new business relationship
- Our purchase orders and subcontract terms include anti-slavery clauses and a right to end the contract for a breach
- For higher-risk products, we ask key suppliers for their own modern slavery statement or policy

PERC LTD
Electrical Consultants & Contractors

6. Risk assessment and management

The parts of our organisation and supply chain where modern slavery risks are highest are agency labour and imported products such as solar PV, batteries and EV chargers. We consider the risk in our directly employed workforce to be low.

Area	Risk level	Why	How we manage it
Agency and temporary labour	Medium	Construction is a known high-risk sector for labour exploitation	Approved UK agencies only, own right-to-work and identity checks on site, site supervisors briefed on warning signs
Imported products (solar PV, batteries, EV chargers, electronics)	Medium to high	Global supply chains for solar polysilicon and battery minerals carry documented forced labour risks	Buy through reputable UK distributors and approved manufacturers, ask for supplier statements, prefer traceable brands
Workwear and PPE	Medium	Textile manufacture is a high-risk sector	Buy from established UK suppliers
Subcontractors	Low to medium	Smaller firms may have weaker controls	Approval process, accreditation checks, contract clauses
Directly employed staff	Low	Skilled, qualified and directly paid workforce	Recruitment checks, contracts, fair pay

We review these risks each year at our Management Review Meeting, and whenever we take on a new type of work or supplier.

7. Key performance indicators

We use these key performance indicators to measure our progress in tackling modern slavery, and report on them at the annual Management Review Meeting.

Measure	Target	This year
Employees and agency workers with right-to-work checks on file	100%	2
Staff who have completed modern slavery awareness training	100%	2
New subcontractors and agencies approved before use	100%	2

Measure	Target	This year
Purchase orders and subcontracts with anti-slavery clauses	100%	0
Modern slavery concerns reported	Every report investigated	0
Confirmed cases in our business or supply chain	0	0

8. Training and awareness

Everyone working for PERC Ltd is made aware of our Modern Slavery Policy and of how to spot and report concerns.

- New starters are briefed on the policy during induction
- Site supervisors and anyone who hires labour or buys materials receive further training on warning signs
- Modern slavery is covered in toolbox talks at least once a year
- Our zero-tolerance approach is shared with suppliers, subcontractors and partners at the start of each relationship, and reinforced where needed
- Free guidance from the Home Office and the Modern Slavery & Exploitation Helpline is used to support our training

9. Reporting concerns

Anyone who suspects modern slavery in our business or any tier of our supply chain should report it as early as possible. We support anyone who raises a genuine concern in good faith, even if it turns out to be mistaken, and no one will suffer detrimental treatment for doing so.

Concerns can be raised through:

- Your line manager or the Managing Director
- PERC Ltd's compliance contact, compliance@percltd.com
- CIRAS, the confidential reporting service for the transport sector, which PERC Ltd is a member of
- The Modern Slavery & Exploitation Helpline: 08000 121 700
- Crimestoppers, anonymously: 0800 555 111

If someone is in immediate danger, call 999.

10. Our plans for the next 12 months

Over the coming year we will:

- ☐ Ask our main electrical wholesalers, solar PV and EV charger suppliers for their modern slavery statements
- ☐ Add a short modern slavery questionnaire to our subcontractor and agency approval process
- ☐ Deliver a modern slavery toolbox talk to all site staff

- ☐ Check that anti-slavery clauses are in all standard purchase order and subcontract terms
- ☐ Record and report the measures in section 7 at the next Management Review Meeting
- ☐ Review and republish this statement within six months of our financial year end

11. Approval

This statement was approved by the Board of Directors of PERC Ltd on **8th October 2025** and is signed by a director. It will be reviewed and updated each year.

Signed: D Williams

Darren Williams, Managing Director, PERC Ltd

Date: **08th October 2025**