

Anti-Slavery and Human Trafficking Statement

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Our Group

The Company is a leading provider and associated highways services. We pride ourselves on our core values of safety, collaboration, delivery, innovation and integrity that together reinforce our position as a market leader.

We operate from 39 location nationally and employ 1 136 colleagues and doing business in an ethical way is one of our most important values.

At group level, we set expectations for how our businesses conduct their activities through the issue of Group policies. Each of our businesses is required to conduct its activities to deliver conformance with these expectations and manage risks associated with its activities, including modern slavery.

Our Values and Commitments

The Company has a zero-tolerance approach to modern slavery, and we are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 www.gov.uk/government/collections/modern-slavery-bill

We will not support or deal with any business knowingly involved in slavery or human trafficking.

We do not use forced labour - slave, prison, indentured, bonded, or otherwise.

We do not traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction or fraud.

Working is voluntary and workers are free to leave work and terminate their employment or other work status with reasonable notice.

Workers are given clear and understandable contracts regarding the terms and conditions of their engagement in writing.

We are not allowed under immigration law to employ any person who is not legally entitled to work in the UK. To ensure that we comply with that law and at the same time avoid unlawful racial discrimination against migrant workers, we will check that all persons, including local persons, who we intend to employ are entitled to work here and entitled to do the work in question. These checks will consist of ID checks that are compliant with sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006. The documents used for these ID checks to verify the right to work in the UK will be compliant with Home Office Guidance and copies of all documents will be retained for at least 2 years after the individual has left our employment, in line with our GDPR compliant retention policy.

We do not require workers to surrender government issued identification, passports, or work permits as a condition of working (We may only temporarily hold onto such documents to the extent reasonably necessary to complete legitimate administrative and immigration processing).

For completeness we will ensure that all agency, self-employed, subcontracted and consultant personnel also undergo the same checks to ensure eligibility to work in the UK.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Our Associated Policies and Governance

We have taken proactive approach to managing the risks and minimising likelihood of modern slavery and human trafficking happening both in our operations and our supply chain. The following Group policies and statements are relevant to human rights and modern slavery:

- **Corporate Social Responsibility Statement**
Acknowledges responsibility to the Modern Slavery Act 2015 and transparency within The Company and with suppliers of goods and services to the organisation.

- **Supply Chain Code Conduct and Responsibilities**
The code sets out the main principles, standards, and ethical practices that we expect all suppliers to follow to align with The Company values including our zero-tolerance approach to modern slavery.
- **Procurement Department Code of Conduct**
A code of conduct for procurement practitioners sets out values and clear guidance on expected behaviour including actions to ensure modern slavery risks are identified and managed in supply chains.
- **Anti-Bribery and Fraud Policy**
Promotes responsible business practices and contributes to a comprehensive approach to addressing ethical challenges in our business environment.
- **Health and Safety Policy**
Contributes to addressing modern slavery by creating a framework that fosters a safe and ethical working environment.
- **Public Interest Disclosure ('Whistleblowing') Policy & Procedure**
The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or those of its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- **Recruitment**
Our employment policies and processes make sure that all direct employees have the appropriate rights to work and are employed in accordance with relevant legislation. Those who are contracted to work on our behalf are required to adopt a similar position in respect of those they engage.
- **Equality, Diversity & Inclusion Policy**
Recognises and respects the importance of an inclusive and diverse workforce. We are fully committed to complying with all relevant legislation, specifically that which is outlined in the Equality Act 2010.
- **Disciplinary Policy & Procedure**
All employees understand what is expected of them and the consequences for misconduct.

Our policies are approved by the Board and regularly monitored and reviewed by the policy owners.

Risk Assessment & Identification of high-risk Suppliers

The risk of modern slavery is recorded within our company in Supplier Risk Register and is regularly reviewed. We use RAG system to record the risk severity which dictates appropriate action to be taken. We use the Register to identify high-risk suppliers and assess whether further controls or assurances need to be put in place.

All suppliers providing labour would be considered as a risk area for modern slavery. However, we procure materials mainly from industries that do not use high-risk sources in this context. Therefore, we deem the risk of modern slavery in our supply chain as medium to low.

Due Diligence

When considering working with and taking on new suppliers, The Company is committed to undertake due diligence. This due diligence includes:

- Evaluating the modern slavery and human trafficking risks by assessing product or geographical risks of each new supplier
- Asking relevant questions in the PQQ
- Reviewing on a regular basis all aspects of the supply chain
- Conducting supplier assessments and audits to ensure compliance
- Taking steps to improve sub-standard suppliers' practices through Supplier Development Programmes

Training and Awareness

We require all key employees involved in supply chain management and any other relevant roles, to complete training to ensure employees are able to assess the risk of slavery and human trafficking. Training covers the various aspects of the business, how employees can recognise the signs of slavery and human trafficking and how it should be reported if this type of activity is suspected. In some cases, supplier's employees may also require training.

The training is available to our employees via our Training Hub (online training platform), Supply Chain Sustainability School (www.supplychainschool.co.uk/topics/sustainability/modern-slavery/) and in-house Procurement department training.

Our Goals and Focus areas for 2024/25

- We are working towards embedding a Sustainable Procurement Standard (ISO20400) that covers the management of modern slavery in our supply chain.
- We will encourage our supply chain take advantage of targeted SCSS training to increase awareness of the risks of modern in supply chains and monitor engagement.
- We will further develop our supply chain's awareness by incorporating modern slavery checks into scorecard metrics.

- We will update and refresh modern slavery training for employees involved in supply chain management and any other relevant roles.

Approval and Review

This Statement is approved by the Board and reviewed annually as part of ongoing training. This statement is made pursuant of section 54(1) of the Modern Slavery Act 2015 and constitutes our Anti-Slavery and Human Trafficking Statement.

Lizi Stewart

Chief Executive Officer (CEO)

Next revision date: 1st January 2025