

We recognise that modern slavery is a crime and a violation of fundamental human rights. It has many different forms including 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.

We have a Zero Tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships. We focus on developing and implementing effective management systems and controls to ensure that all entities in our business or supply chains actively operate within the same criteria.

By ensuring that our business is transparent, We aim to comply with the disclosure obligations under the Modern Slavery Act 2015 or other applicable local legislation. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include prohibitions against the use of staff sourced from forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our supply chain will also hold their own supply chain to the same high standards.

## **Compliance**

Our Executive Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Head of ESG and Improvement has primary responsibility for implementing this policy. This will include monitoring its use and effectiveness and auditing internal control systems and procedures as part of our Integrated Management System to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery within supply chains.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working directly for us or otherwise under our control. They are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If you believe or suspect that a breach (or possible breach) of this policy has occurred, or may occur in the future, you must report it to your line manager as soon as possible. This can be done in accordance with our Whistleblowing Policy or alternatively through the Modern Slavery Helpline on 08000 121 700 <https://www.modernslaveryhelpline.org/>.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is, or may be taking place in any part of our own business or in any of our supply chains.

We have committed to

- The Gangmasters & Labour Abuse Authority Construction Protocol, and work with the GLAA and other partners in reducing opportunities for exploitation and slavery;
- Providing annual training for all employees so that they understand what modern slavery is, and how to recognise the signs of it;
- Enhanced vetting and reviews of our supply chain (contractors, sub-contractors, policies, contracts etc.)
- Raising awareness of modern slavery within our Supply Chain partners;

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- Carrying out regular internal audits as part of our Integrated Management System on both our own policies and procedures, as well as those of our Supply Chain.
- Using labour monitoring and payroll systems;
- Encouraging the reporting of concerns and the protection of whistleblowers; and
- Not knowingly supporting or dealing with any business involved in slavery or human trafficking.

This Statement has been prepared in accordance with Section 54 of the Modern Slavery Act 2015.



**Tim Cockayne**  
**Chief Executive Officer**  
**May 2023**