

Introduction

This policy applies to all of the legal entities listed in the SP100 Business Entities document who shall be referred to in this policy as “We/Our/Us”.

Scope

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.

Operating mainly in the Construction sector, We have a Zero Tolerance approach to modern slavery, and We are committed to acting ethically and with integrity in all Our business dealings and relationships and developing and implementing effective management systems and controls that ensure that nowhere in Our business or supply chain is involved with modern slavery.

By ensuring that Our business is transparent, We will 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.

This policy applies to all those employed or working on Our behalf, in any capacity. This includes but is not limited to employees at all levels, directors, officers, agency workers, temporary staff, contractors, volunteers, interns, external consultants, third-party representatives and business partners.

This policy does not form part of any employee’s contract of employment, and We may amend it at any time.

Responsibility

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 to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring 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.

As with all of Our policies and procedures, employees are invited to comment on this policy and suggest ways in which it might be improved, this can be done through the employee’s line Manager.

Compliance

Individuals and/or Organisations working for or on Our behalf must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of Our business or supply chains is the responsibility of all those working for Us or 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/>.

If you are unsure about whether a particular act, the treatment of workers more generally, or the working conditions within any tier of Our supply chain constitutes any of the various forms of modern slavery, raise it immediately with your line Manager or the HR Department.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. 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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Risk Management

We have developed a risk assessment which analyses risks within our supply chain, this is regularly reviewed and updated. We have used the following indicators of forced labour as set out by the International Labour Organisation (ILO) as part of our risk management approach:

Abuse of vulnerability	Deception	Restriction of movement
Isolation	Physical and sexual violence	Intimidation and threats
Retention of identity documents	Withholding of wages	Debt bondage
Abusive working and living conditions	Excessive overtime	

Our exposure remains unchanged, and whilst not high risk, We have identified these potential risks within our supply chain as being:

- Suppliers providing temporary labour for the delivery of our critical infrastructure safety works;
- Labour used by suppliers for the manufacturing of products such as PPE and digital.

Our progress in addressing modern slavery risks since implementation of this policy has included:

- Mandatory modern slavery training for all employees;
- Enhanced vetting and due diligence of Our supply chain partners;
- Initial signatories to the Gangmasters and Labour Abuse Authority Construction Protocol.

Actions

We are committed to a zero-tolerance approach to modern slavery and will ensure compliance with this policy by:

- 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;
- 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. For example, checking whether all employees are paid at least the minimum wage and have the right to work;
- 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.

Continual improvement

As part of Our annual reviews of our management systems, we have identified the following improvements for 2025:

- Launch our revised Supply Chain Code of Conduct;
- Introduce Annual Self-Assessments for our Supply Chain;
- Introduce Social Audits that are aligned with SA8000 Social Accountability standard.

Breach

Any employee found to be in breach of this policy will face disciplinary action up to, and including summary dismissal for misconduct or gross misconduct.

We may terminate Our relationship with other individuals, and organisations working with Us or on Our behalf if they are found in breach of this policy.

Review

We will regularly review the effectiveness of Our policies and procedures on the basis of reports received, changes of regulation and legislation, changes of working practices and in any event at intervals not exceeding 12 months.

Key performance indicators to demonstrate the effectiveness of our approach includes:

- % of employees trained;
- % of suppliers signed up to Our Code of Conduct;
- % of suppliers completing an annual self-assessment;
- Social Accountability audit performance.

Communication

This Policy is communicated to all employees and is made available to Our supply chain and other interested parties to inform them of Our zero-tolerance approach to modern slavery and to promote wider adoption of responsible practices.

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



Matt Robinson
Chief Financial Officer
10th April 2025