

COR-POL-08: Modern Slavery and Human Trafficking Policy

Introduction

Core Highways is committed to preventing modern slavery and human trafficking in all its operations and supply chains. This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken during the financial year 1 January 2025 to 31 December 2025 to understand, identify and reduce the risks of modern slavery within our business.

This Statement applies to Core Highways Group Limited and all subsidiaries operating within England and Wales.

Our Business

We are a leading provider of temporary traffic management, barrier solutions, and event signage, delivering comprehensive coverage across England and Wales, from the North to the South. All solutions are designed with the safety of our people, partners and the public in mind, with experts ready to advise on faster, more cost-efficient and more effective approaches.

We take pride in our Core Values: Taking responsible actions, being there when it matters, Delivering success, and being Stronger together. These principles guide every aspect of our work, driving excellence while fostering collaboration and accountability.

We operate from 39 locations nationally and employ 1200 colleagues and doing business in an ethical way is one of our most important values.

We set expectations for how our business conducts its activities through the issue of company policies. Each area of the business is required to conduct its activities to deliver conformance with these expectations and manage risks associated with its activities, including modern slavery.

Our supply chain includes:

- Labour suppliers (agency workers and subcontractors)
- Plant and equipment hire
- Traffic management products, including cones, signs, frames, posts, lighting, plastic and steel products
- PPE and workwear
- Technology, fleet and support services
- Facilities, cleaning, security and other ancillary services

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The majority of our direct suppliers are based in the UK; however, we recognise that upstream supply chains include higher-risk geographies and sectors such as manufacturing, textiles and raw materials. We therefore take a risk-based approach to our due diligence and auditing activities.

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.

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.

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).

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

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

We recognise that the highways and construction sector carries an inherent risk of labour exploitation due to the use of subcontracted labour, complex supply chains and time-critical

project delivery. To ensure we manage this risk effectively, Core Highways maintains a live Supplier Risk Register that is reviewed regularly and whenever new suppliers are onboarded. 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.

Our risk assessment considers:

- Sector and commodity risk
- Country and regional risk
- Labour model and use of temporary or agency workers
- Supplier performance, history and transparency
- Responses to PQQ and Modern Slavery due diligence questionnaires
- Alignment with our Supply Chain Code of Conduct and Responsibilities

Due Diligence

We carry out proactive due diligence on all suppliers proportional to their assessed risk. This includes:

- Pre-qualification checks using our Modern Slavery and Ethical Trading Questionnaire
- Verification of supplier modern slavery statements (where in scope of the Act)
- Assessment of labour practices, recruitment routes and right-to-work processes
- Contractual requirements that suppliers:
 - Uphold our Supply Chain Code of Conduct
 - Cascade modern slavery standards to their sub-suppliers
 - Provide transparency when requested
- Right-to-audit clauses within supplier agreements
- Targeted audits for higher-risk suppliers

Where concerns are identified, we work with suppliers to implement **corrective action plans**, monitor progress and, when necessary, suspend or terminate relationships that fail to meet our required standards.

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.

To ensure our people remain alert to the risks of modern slavery and human trafficking, Core Highways provides:

- Mandatory modern slavery training for colleagues in Procurement, HR, Operational Management and key supervisory roles
- Toolbox talks and site-based awareness briefings for operational teams
- Access to Supply Chain Sustainability School modern slavery modules
- Targeted supply chain engagement sessions focusing on risk indicators
- Awareness posters displayed across our depots and workplaces

Further development programmes are planned for 2025/2026 to strengthen frontline recognition of risk indicators, particularly amongst supervisors, site leaders and delivery partners.

Reporting, Escalation and Remedy

Core Highways encourages all colleagues, suppliers and third parties to report any concerns related to modern slavery or unsafe labour practices. We operate a confidential and independent whistleblowing hotline and online reporting platform, available 24/7.

We are committed to:

- Ensuring no individual suffers retaliation for raising concerns in good faith
- Conducting prompt and fair investigations
- Protecting vulnerable workers and ensuring access to support
- Reporting potential criminal activity to the appropriate authorities
- Working with suppliers to provide remedy and prevent reoccurrence
- Ensuring senior leadership oversight of all reported cases

All modern slavery concerns are escalated to the Executive and Group Head of HR, and reviewed quarterly by the Executive Leadership Team.

Measuring Effectiveness – KPIs

To assess the effectiveness of our approach, Core Highways monitors the following Key Performance Indicators (KPIs):

- Percentage of higher-risk suppliers completing modern slavery due diligence checks
- Percentage of high-risk suppliers with an annual reviewed Modern Slavery Checklist
- Percentage of Procurement and HR personnel trained annually
- Percentage of operational managers completing targeted awareness training
- Number of audits conducted on high-risk suppliers
- Number of concerns raised via the whistleblowing system and outcomes
- Time taken to close corrective action plans

Performance against these KPIs is monitored regularly by the Executive Leadership Team and used to shape improvement plans.

Accessibility of This Statement

This Statement is published on the Core Highways website and is accessible from the homepage in accordance with section 54 of the Modern Slavery Act 2015. It will be reviewed annually and updated to reflect progress, changing risks and sector developments.

Achievements in 2024/2025

- We launched an independent Whistleblowing hotline and online reporting platform. The hotline and online reporting platform are provided by an external provider to ensure anonymity for anyone that wants to remain anonymous whilst reporting a public interest disclosure (Whistleblowing).
- We produced Modern Slavery posters to be displayed across all our locations and refreshed modern slavery training for colleagues involved in supply chain management and any other relevant roles.
- We communicated with our supply chain to take advantage of targeted SCSS training to increase awareness of the risks of modern in supply chains.
- We produced a signable version of our Supply Chain Code of Standards and Responsibilities and integrated it into our supplier approval process. This applies to all suppliers, whether they are one-time suppliers or long term strategic partners.
- We worked towards embedding a Sustainable Procurement Standard (ISO20400) that covers the management of modern slavery in our supply chain.

Our Goals and Focus areas for 2025/2026

We remain committed to regularly reviewing and enhancing our processes to ensure our operations are free from forced labour, human trafficking and slavery in our supply chain.

In line with this commitment, our goals for the upcoming calendar year are:

- Deliver four targeted communication updates annually (one per quarter) to our supply chain and organise two internal modern slavery awareness training sessions for the colleagues by the end of 2025, ensuring minimum 80% of staff participation across key areas.
- Starting in Q1, we will incorporate a modern slavery check into the supplier onboarding process and require new suppliers to complete the Modern Slavery

Checklist (Stronger Together). Any existing suppliers will be required to complete the Checklist during the annual document renewal or contract renewal.

- Conduct quarterly reviews of our processes, starting from Q1 2025, to ensure full compliance with anti-slavery standards, and document findings with action points.

Approval and Review

This Statement is 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.



Alastair Smyth
Chief Executive Officer (CEO)