

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

Statement

Core Highways is committed to preventing modern slavery and human trafficking in all its operations and supply chains.

We have 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.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and outlines our approach during the year 1 January 2025 to 31 December 2025.

Objective

This Policy sets out the steps taken by Core Highways to understand, identify and reduce the risks of modern slavery and human trafficking within our business and supply chains.

Scope

For the purposes of this Policy, “the Group” refers to Core Highways Group Limited and its subsidiaries.

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

It applies to all employees and extends to contractors, suppliers and other business partners engaged by or on behalf of the Group.

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. Doing business in an ethical way is one of our most important values.

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We set expectations for how our business conducts its activities through the issue of Group 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

Most 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.

Values and Commitments

Core Highways is committed to conducting business ethically and responsibly, and to respecting the human rights of all individuals connected to our operations and supply chains.

We are committed to:

- Acting with integrity and transparency in all business dealings
- Ensuring work is voluntary and that individuals are free to leave employment or engagement with reasonable notice
- Treating all workers fairly and with dignity
- Providing clear and understandable written terms and conditions of employment
- Ensuring ethical recruitment practices and lawful right-to-work checks
- Working only with suppliers and business partners who share our commitment to preventing modern slavery and human trafficking

We expect all employees, contractors, suppliers and other business partners to meet these standards and to take appropriate steps to ensure the same standards are upheld throughout their own supply chains.

Offences

Core Highways prohibits all forms of modern slavery and human trafficking. This includes, but is not limited to:

- The use of forced, compulsory, bonded or prison labour
- Human trafficking or exploitation of workers by means of threat, force, coercion, abduction or fraud
- Requiring workers to surrender government-issued identification, passports or work permits as a condition of employment (other than where temporarily required for legitimate administrative purposes)

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- Preventing workers from freely leaving employment or terminating their engagement with reasonable notice
- Failing to provide workers with clear and understandable written terms and conditions of employment
- Engaging with or knowingly supporting organisations involved in slavery or human trafficking

Penalties and Consequences

Any employee found to be in breach of this Policy may be subject to disciplinary action in accordance with the Group's Disciplinary Policy and Procedure.

Modern slavery and human trafficking are criminal offences under the Modern Slavery Act 2015. An individual convicted of an offence under the Act may, on conviction on indictment, face imprisonment for life and/or an unlimited fine. On summary conviction, offences may result in imprisonment (up to 12 months) and/or a fine, subject to applicable statutory limits. Assets connected with criminal activity may also be subject to confiscation under the Proceeds of Crime Act 2002.

Where suppliers, contractors or other business partners are found to have breached this Policy, the Group may take appropriate action, which may include:

- Requiring corrective action plans and ongoing monitoring
- Suspension of engagement
- Termination of contracts in line with contractual rights

The Group reserves the right to report any suspected criminal activity to the appropriate authorities. Breaches of this Policy may also result in significant legal, regulatory, contractual and reputational consequences.

Roles and Responsibilities

The following roles have responsibilities in relation to the implementation and oversight of this Policy:

- **Board of Directors**
The Board is responsible for approving this Policy and providing overall oversight to ensure that appropriate systems and controls are in place to prevent modern slavery and human trafficking.
- **Executive Leadership Team**
The Executive Leadership Team is responsible for overseeing modern slavery risks, reviewing reported concerns, and ensuring that appropriate actions are taken where risks are identified.
- **Policy Owner**
The Policy Owner is responsible for the maintenance, review and implementation of this Policy, including oversight of supplier due diligence processes and the management of modern slavery risks within the supply chain.
- **Procurement**
The Procurement function is responsible for carrying out supplier due diligence, supporting risk assessments and escalating any modern slavery concerns identified within the supply chain.
- **Human Resources**

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Human Resources is responsible for ensuring ethical recruitment practices, right-to-work compliance, and the provision of appropriate training and awareness to employees.

- **Line Managers and Operational Leaders**

Line managers and operational leaders are responsible for remaining alert to potential red flags, promoting ethical working practices, and escalating any concerns in line with this Policy.

- **Employees and Associated Persons**

All employees, agency workers and contractors are responsible for complying with this Policy and for reporting any concerns relating to modern slavery or human trafficking.

Risk Assessment and 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.

Red Flags

The following indicators may suggest an increased risk of modern slavery or human trafficking. These indicators do not in themselves confirm the existence of modern slavery but should prompt further consideration and escalation in line with this Policy:

- Use of labour providers, agencies or subcontractors without appropriate due diligence or transparency
- Workers who appear reluctant to speak freely or are accompanied or supervised in an unusual manner
- Lack of clear written terms and conditions of employment for workers
- Workers lacking appropriate right-to-work documentation or where documentation appears to be withheld
- Unusual recruitment practices, including excessive fees or unclear recruitment routes
- Excessive working hours, unpaid overtime or withholding of wages
- Poor or unsafe working or accommodation conditions
- Supply chains involving higher-risk sectors or geographies with limited visibility beyond tier-one suppliers

Any identified red flags must be reported in accordance with the How to Raise Concerns section of this Policy.

How to Raise Concerns

Core Highways encourages all colleagues, suppliers and third parties to report any concerns related to modern slavery or unsafe labour practices.

Concerns may be raised through the following channels:

- Line manager or supervisor
- Human Resources
- The Group's confidential and independent whistleblowing hotline or online reporting platform, which is 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 are reviewed quarterly by the Executive Leadership Team.

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Monitoring, Reporting and Review

The effectiveness of this Policy and associated controls is monitored on an ongoing basis to ensure modern slavery risks are identified, managed and escalated appropriately.

Monitoring activities include:

- Maintenance and review of the Supplier Risk Register, including risk ratings and mitigation actions
- Supplier due diligence
- Monitoring completion of relevant training and awareness activities

Reporting and Oversight

Modern slavery risks, concerns and performance information are reported to the Executive Leadership Team. Reported concerns are reviewed and escalated as appropriate, and actions are monitored to completion.

Measuring Effectiveness (KPIs)

To assess the effectiveness of our approach, Core Highways monitors the following key performance indicators:

- Percentage of employees completing relevant training
- Number of concerns raised via reporting channels and associated outcomes

This Policy and associated controls are formally reviewed at least annually to ensure they remain effective and aligned with legal requirements and operational risk.

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 modern slavery training modules provided by the Supply Chain Sustainability School
- Targeted supply chain engagement sessions focusing on risk indicators
- Awareness posters displayed across our depots and workplaces

Access to the Supply Chain Sustainability School is available to employees free of charge. Employees may request access via the HR team or register directly and be linked to the Group's membership.

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Mandatory training is delivered through e-learning modules where appropriate. Completion of mandatory training is monitored, and reports on training completion are reviewed. Where training is not completed within required timeframes, appropriate follow-up action is taken.

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

Associated Policies, Information and Governance

This Policy should be read in conjunction with other relevant Group policies, procedures and guidance, which provide further information on ethical conduct, supply chain management, reporting mechanisms and employee responsibilities.

This Policy should be read in conjunction with other relevant Group policies and procedures, including but not limited to:

- Social Value and Sustainability commitments published on the Group website
- PSC-COP-01 Supply Chain Code of Standards and Responsibilities
- COR-POL-01 Health, Safety and Wellbeing Policy Statement
- COR-POL-01 ARR Health Safety and Wellbeing Arrangements
- COR-POL-07 Public Interest Disclosure (Whistleblowing) Policy & Procedure
- COR-POL-10 Anti-Bribery, Corruption and Fraud Policy
- HR-MAN-01 Employee Handbook
- HR-POL-01 Recruitment & Selection Policy
- HR-POL-05 Disciplinary Policy & Procedure
- HR-POL-29 Equality, Diversity & Inclusion Policy

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

Useful Links

The following links provide further information and support in relation to modern slavery and human trafficking:

- [UK Government guidance on the Modern Slavery Act 2015](#)
- [Modern Slavery and Exploitation Helpline](#)
- [Modern Slavery and Human Trafficking: Offences and Defences](#)
- [National Crime Agency - Modern slavery and human trafficking](#)

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.

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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 Policy is reviewed at least annually, or earlier if there are significant changes to legislation, business operations or identified modern slavery risks. The next review date is 03/03/2027.

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This statement is made pursuant of section 54(1) of the Modern Slavery Act 2015 and constitutes our Anti-Slavery and Human Trafficking Statement.

A handwritten signature in black ink that reads "ASmyth".

Alastair Smyth
Chief Executive Officer (CEO)
Date: 03/03/2026

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