

Modern Slavery & Human Trafficking Policy

1. Our Policy

This policy applies to all members of the United Infrastructure Group.

The United Infrastructure Group is opposed to modern slavery and human trafficking and has a zero- tolerance approach to slavery and human trafficking. Our Group General Counsel has overall responsibility for implementing this policy, but all our staff and suppliers need to play their part in ensuring that modern slavery and human trafficking is not taking place anywhere in our own business or in any of our supply chains. This approach is taken in line with international standards including the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct and the ILO's Labour Standards.

In accordance with the strengthened UK Modern Slavery requirements effective from 2026, the Group will ensure that its annual Modern Slavery Statement complies with the mandatory reporting structure, reflects the actions taken during the financial year, and is submitted to the Government's central registry.

All our staff and employees must comply with this policy. Not doing so will be a disciplinary breach, and may result, in the most serious cases, in your dismissal by the United Infrastructure Group.

We require our suppliers to comply with this policy by means of providing supporting evidence of their own modern slavery controls where this is necessary to demonstrate compliance with our due-diligence obligations. If they do not do so it may result in the termination of our working relationship with that supplier.

Our annual Modern Slavery Statement will be approved by the Board of Directors and signed by a statutory director.

2. What is Slavery

The Modern Slavery Act 2015 covers four activities, all of which are covered by this policy:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or Compulsory Labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

The Group recognises that modern slavery can also include deceptive recruitment practices, debt bondage, coercive control and other forms of exploitation that may arise within complex supply chains. These definitions will be reviewed annually to ensure continued alignment with statutory guidance.

3. How is it Relevant to us?

Slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, you may think this subject is not relevant to us, but it is.

The Modern Slavery Act 2015 recognises the important part businesses can and should play in tackling slavery and trafficking and encourages them to do more. **From 2026, organisations are required to demonstrate clearer evidence of the steps taken to identify and mitigate risks, including structured reporting across the mandatory statutory areas.**

Our Board have considered the risk of slavery and human trafficking occurring in our business and our supply chains (primary value and secondary value) and concluded that the overall risk to our business is low due to the jurisdictions in which we are based and operate (i.e. the UK). However, we recognise that the risk is higher because of the nature of our industry and some of our core activities, particularly those relating to the construction and maintenance of properties. Consequently, on a day to day basis we need to pay close attention to:

- Our supply chain generally and in particular:
 - a) Construction services suppliers
 - b) Services suppliers generally;
 - c) Branded goods suppliers; and
 - d) Any other suppliers in which the Board has considered the risk of occurrence of slavery to be greater;
- Corporate hospitality, again due to the risk of occurrence of slavery being
- considered to be higher;
- IT and software related suppliers where products may be manufactured, or
- software developed, in jurisdictions that may not have adequate safeguards; and
- Any outsourced activities, particularly in jurisdictions that may not have adequate safeguards.

The Group will maintain a documented assessment of these risk areas and ensure that identified risks are reflected in our annual Modern Slavery Statement.

4. Responsibilities

This policy sets out the key risk areas we face and our approach to avoiding and preventing slavery.

We all have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

Everyone must observe this policy and be aware that turning a blind eye is unacceptable.

4.1 Our Group

We will:

- Maintain clear policies and procedures preventing slavery, exploitation and trafficking within our business and protecting our workforce and reputation;
- Be clear about our recruitment policy (see Recruitment);
- Assess our supply chains (see Supply Chains);
- Lead by example by making appropriate checks on our employees, recruitment agencies and suppliers to ensure we know who is working for us;
- Ensure we have in place an open and transparent grievance and reporting process for all staff;
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare; and
- Make a clear statement regarding our opposition to slavery and trafficking (our Anti-Slavery Statement is published on our website).
- **Implement enhanced due-diligence processes for higher-risk suppliers, including evidence-based assessments, ongoing monitoring and escalation procedures where concerns arise.**
- **Ensure that our annual Modern Slavery Statement complies with the 2026 requirements, including Board approval, director sign-off, submission to the central Government registry and reporting across all mandatory areas.**

4.2 Managers

Managers will:

- Listen and be approachable to colleagues;
- Respond appropriately if they are told something that might indicate a colleague is in an exploitative situation;
- Remain alert to indicators of slavery (see Identifying Slavery);
- Raise the awareness of our colleagues by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do;
- Use their experience and professional judgement to gauge situations; and
- 4Comply with the United Infrastructure Group's supplier appointment policy in relation to each supplier that they wish to introduce to the United Infrastructure Group in accordance with our Supplier Appointment Process set out in Appendix 1 and the guidance set out in Appendix 2
- **Ensure that any concerns relating to labour providers, subcontractors or recruitment practices are escalated promptly in line with our due-diligence and reporting procedures.**

4.3 Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- Keep your eyes and ears open - if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services (see 7. Identifying Slavery), follow our reporting procedure (see 8. Reporting Slavery);
- Follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated;
- Tell us if you think there is more we can do to prevent people from being exploited; and
- **Complete all mandatory modern slavery training modules, including refresher training introduced under the 2026 requirements, and participate in any additional awareness activities relevant to your role.**
- Comply with United Infrastructure Group's supplier appointment policy in relation to each supplier that you wish to introduce to the United Infrastructure Living Group in accordance with our Supplier Appointment Process set out in Appendix 1 and the guidance set out in Appendix 2.

5. The Risks

Risks of slavery and human trafficking are present in both our supply chain and our business, but the risks are potentially significantly more prominent in our supply chain (both our immediate and intermediate suppliers). We manage this risk through our procedures as set out in this and our other policies and procedures. **The group will maintain a documented assessment of these risks and ensure that the outcomes of this assessment are reflected in our annual Modern Slavery Statement.**

Our business faces particular risks in the following areas:

- Agency Recruitment
- Corporate Hospitality

Our supply chain faces particular risks in the following areas:

- Construction services suppliers
- Other services suppliers;
- Goods (e.g. construction materials) suppliers;
- Agency recruitment;
- Corporate hospitality;
- Suppliers of IT goods and services.

Where higher-risk areas are identified, we will apply proportionate due-diligence measures, including additional checks, monitoring and escalation where concerns arise.

6. Our procedures

6.1 Anti-Slavery Statement

We make a clear annual statement that clearly sets out our opposition to slavery and human trafficking, our commitment to taking our responsibilities seriously and the practical steps we have taken to identify and mitigate the risk of slavery in our organisation. This statement is published on our website as part of our statutory reporting obligations.

6.2 Supply Chain

- We identify our supply chain - we know who is providing goods and services to us.
 - a) A list of all approved supply chain is held within our supply chain databases; and
 - b) Due diligence is be undertaken for each supplier in the context of the Modern Slavery Act to identify the level of risk. Our Strategic Procurement Processes and Supplier Appointment Processes provide a guide to help with this. Any concerns must be referred to the Group Procurement & Supply Chain Director for consideration. **This will include clearer documentation of risk assessments and, where appropriate, requests for supporting evidence from medium- and high-risk suppliers.**

- We tell our supply chain that we are opposed to slavery and trafficking and that we do not accept any form of exploitation.
- All supply chains are asked to acknowledge our approach to slavery and trafficking and to confirm their acceptance of it in writing. We have a Modern Slavery Act and Anti-Bribery Confirmation to help with this, which is set out in Appendix 3.
- Where contract terms are negotiated with supply chain, particularly major suppliers or suppliers considered at higher risk of slavery, we endeavour to include an anti-slavery clause in those contracts which explains that we are opposed to slavery and trafficking, that we do not accept any form of exploitation and that we expect our supplier to operate such an approach within their supply chain.
- If a prospective supply chain member is not willing to sign the confirmation statement or agree to an appropriate provision in their contract this should be referred to the Group Procurement & Supply Chain Director for consideration.

6.3 Recruitment

If, through our recruitment process, we suspect someone is being exploited, the HR department will follow our reporting procedures (See Reporting Slavery).

6.3.1 Using Agencies

- a) Our HR department follows group policy and only uses pre-approved reputable recruitment agencies.
- b) To ensure the potential for slavery and trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:
 - Conducting background checks where considered appropriate or necessary in the circumstances;
 - Investigation reputations where considered appropriate or necessary in the circumstances;
 - Ensuring the staff it provides have the appropriate paperwork (e.g. work visas or other right to work documentation); and
 - Ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying.
- c) We keep agents on the list under regular review, at least annually.

6.3.2 General Recruitment

- We ensure that members of staff have a written contract of employment and on appointment ask them to confirm that they have not had to pay any direct or indirect fees to obtain work.
- We ensure that members of staff are legally able to work in the UK.
- We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).
- We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

7. Identifying Slavery

There is no typical victim of slavery or trafficking and some victims do not understand that they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification or travel documents;
- The person is acting as though they are being instructed or coached by someone else;
- They allow others to speak for them when spoken to directly;
- They are dropped off and collected from work;
- The person is withdrawn, or they appear frightened;
- The person does not seem to be able to contact friends or family freely; and/or
- The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive. Further guidance provided by the Home Office is set out in Appendix 2.

Remember, a person may display a number of the indicators, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

Colleagues should remain alert to emerging forms of exploitation, including coercive recruitment practices, debt bondage and digital-enabled control, and report concerns through the established channels. If you have a suspicion, report it.

8. Reporting Slavery

Talking to someone about your concerns may stop someone else from being exploited or abused.

If you think that someone is in immediate danger, dial 999.

Otherwise, you should discuss your concerns with a member of the HR Department who will decide a course of action and provide any further advice.

Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of any immediate danger, you discuss your concerns first with a member of the HR Department before taking any further action.

9. Training

We provide specific training to those staff members who are involved in managing recruitment and our supply chains.

More general awareness training is provided to all staff during their induction training and thereafter through formal training sessions, via team leaders or managers and online training modules as appropriate. It is a requirement of your employment or appointment that you complete this training.

Training content will be updated to reflect the strengthened requirements, including enhanced due-diligence expectations, updated risk indicators and the mandatory reporting structure. Refresher training will be provided where appropriate.

10. Monitoring our procedures

We review this policy and our procedures regularly, at least annually and will provide training as appropriate on any changes we make.



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