

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

The Modern Slavery Act of 2015 requires certain businesses to provide disclosure concerning their efforts, if any, to address the issues of slavery and human trafficking within their own operation and in their supply chains. The disclosures are intended to provide clients with the ability to make better, more informed choices about the company which they support.

Neilcott is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations and that of our supply chain. Neilcott recognises that slavery and human trafficking can occur in many forms, and the construction sector which is our core marketplace is particularly susceptible to exploitation in this regard. Therefore, throughout this disclosure we use the terms “slavery and human trafficking” to encompass various forms of coerced labour.

Our commitment to human rights is outlined in our Code of Conduct. We have a commitment to improve and implement the Code of Conduct across our supply chain.

Neilcott takes steps to verify, evaluate and address risks of slavery and human trafficking in our supply chain. The first step in this process is to set clear expectations for our suppliers. Our Code of Conduct states “We do not tolerate forced, debt bonded, indentured labour practices or human trafficking. Neilcott does not allow harsh or inhumane treatment, including entrapment, threats on persons or relations, corporal punishment or the threat of corporal punishment. We expect our suppliers and others to meet these expectations”. Our Code on Conduct also, in turn, provides that “forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used”.

We regularly notify our suppliers of their obligation to comply with our Code of Conduct. Our verification process involves an assessment of our suppliers, who are required to complete a Supply Chain questionnaire, including questions targeted at slavery and human trafficking risk. Neilcott uses this questionnaire to determine the risk profile of suppliers for environmental, safety, human rights (including slavery and human trafficking) and other supplier sustainability matters. In addition to this questionnaire, we can utilise a more detailed Modern Slavery and Human Trafficking addendum that specifically covers slavery and human trafficking risks, targeting at those companies that operate in trades that we consider higher risk. These are generally lower-skilled trades, with high labour demand.

We view assessments and audits as integral parts of our overall supply chain management process. They help us identify compliance gaps where immediate action is needed, and root causes that enable development of systemic solutions and improvements.

Should we identify a suspected case of modern slavery, our first consideration is the immediate wellbeing of any potential victim(s) and if it is considered that they are possibly in imminent danger, we will contact the relative authorities, such as the police.

We will use the framework set out within the National Referral Mechanism (NRM) to refer any individual and ensure that the persons affected, receive the appropriate support. At the same time, we will discreetly refer any victim to the Modern Slavery Helpline and/or the Gangmasters and Labour Abuse Authority (GLAA) for additional support information, whilst being mindful not to compromise their

personal safety. If appropriate, we will contact the supply chain company and may conduct our own enquiries, ahead of a decision to suspend or cease trading with the company involved.

Further details relating to this topic are covered within our Site Safety Induction presentations and supporting information posters that are regularly displayed within the common welfare areas of our sites.

Although the vast majority of personnel based on our projects is provided via our supply chain, we do recognise the importance of undertaking our own checks on Neilcott employees and we validate their identity and right to work within the UK, as part of our recruitment process, as well as providing information and guidance around recognition potential indicators that a colleague or other persons that may be subjected to exploitation.

Neilcott's Managing Director sets the tone of our ethical culture and holds our management accountable for communicating ethics and compliance expectations. Our leadership team regularly communicate with employees and senior managers regarding the importance of ethics and legal compliance. We believe that this "message from the top" along with ethics and compliance training and regular communication throughout the year, helps to create a supportive, ethical and legally compliant culture within the business.

Through our Code of Conduct (which contains specific information on slavery and human trafficking) we seek to promote honest and ethical conduct, deter wrongdoing and support compliance with applicable laws and regulations. The principles reflect our corporate policies related to but not limited to slavery, human trafficking, conflicts of interest, non-discrimination and inclusion, antitrust, anti-bribery, and anti-corruption and protecting our company's reputation.

The Code of Conduct directs employees to consider short-term and long-term impacts on human rights and the community when making business decisions, and to report potential issues as soon as they are identified.

We encourage anyone (including employees, sub-contractors, suppliers and clients) to report in good faith any issues, or concerns about potential ethics, human rights, discrimination, legal or regulatory violations, including improper or unethical business practices such as fraud or bribery to our senior leadership or public authorities.

Useful links :

National referral mechanism guidance: adult (England and Wales)

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales#Section-1>

Gangmasters & Labour Abuse Authority

<https://www.gla.gov.uk/>

Modern slavery & exploitation helpline

<https://www.modernslaveryhelpline.org/>