POLICY ANNUAL SLAVERY AND HUMAN TRAFFICKING STATEMENT

People

1.0 Introduction

Rainton Construction Limited's (RCL) annual Slavery and Human Trafficking Statement provides information to supplement our Modern Slavery and Trafficking policy. In this statement, we set out the steps we have taken during the calendar year to ensure that slavery and human trafficking are not taking place in our supply chains or any part of our business. We include details of our activities, supply chains and the actions we have taken and are taking to ensure that we do not deliberately or inadvertently support modern slavery. The content of our modern slavery statement will evolve over time, demonstrating a year-on-year improvement outlining practical progress on tackling the risks and incidence of modern slavery in our operations and supply chains. This statement relates to actions and activities from 1st January 2023 to 31st December 2023.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for RCL.

2.0 Scope

Rainton Construction Limited:

The Provision of Bridge Refurbishment, including Reinforced Concrete Structures and Associated Infrastructure Works, Road Construction and Resurfacing.

National Highways Sector Schemes for Quality Management in Highway Works Scheme 16 for Management of The Laying of Asphalt Mixes – Machine Lay and Hand Lay (With Normative Document BS 594987: 2010 Asphalt For Roads and Other Paved Areas – Specification For Transport, Laying, Compaction and Type Testing Protocols).

3.0 Policies and Responsibility

We have made several commitments in our policies to help us to address the risk of slavery and human trafficking occurring in our operations or supply chains. The following policies are the ones that we consider give us strength in avoiding modern slavery or human trafficking under the Act:

- Corporate Social Responsibility
- Equality and Diversity
- Anti-Bribery and Corruption
- Code of Conduct
- Procurement.

The Board of Directors is responsible for determining Company Policies.

4.0 Supply Chain

We are committed to ensuring no modern slavery or human trafficking in the supply chain (including sub-contractors, consultants, materials suppliers, distributors, and labour agencies) or any part of the business. We will take a zero-tolerance approach to slavery and human trafficking.

Signed Policies Are Available Upon Request



ANNUAL SLAVERY AND HUMAN TRAFFICKING STATEMENT

People

POLICY

5.0 Assurance Process

To identify and mitigate slavery and human trafficking risk, we undertake due diligence when considering taking on new supply chain partners and regularly review our existing list. Due diligence and reviews have included:

- Validating all of our supply chain partners against the PAS91 standard as a minimum through our Buyer Service Agreement. Our supply chain partners must be registered with Constructionline and achieve verified status at Silver accreditation to ensure that their business is fully compliant following our requirements (including details of their action on modern slavery). However, supply chain partners with an annual turnover below £350K and less than five employees would only need to complete the Bronze Accreditation question set
- Successfully undertaken surveillance audits to our ISO 45001, ISO 900 and ISO 14001 certifications
- Our standard form contracts include an obligation to comply with our SHEQ Terms and Conditions, containing obligations relating to modern slavery (section 22. Sustainable Procurement).

6.0 Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the supply chain and within the Company, we provide training for those involved in procurement, estimating, Health & Safety and those responsible for supply chain management and people management.

The following training has been provided within our business to staff this year:

iHasco Modern Slavery - e-learning module

7.0 Future Development

- Undertake a full review and refresh of the MGL Group on-boarding process, further strengthening legal working in the UK requirements and the steps prospective organisations have taken to ensure that slavery and human trafficking are not taking place in their supply chains or any part of their business.
- Conduct compliance audits with our key labour agencies, including modern slavery arrangements.
- Increasing awareness among our employees to ensure they can identify the signs of modern slavery and understand how to report it by rolling out the e-learning module to the broader business, supported by TBT sessions.

Signed Policies Are Available Upon Request





ANNUAL SLAVERY AND HUMAN TRAFFICKING STATEMENT People

| Revision and Approval | | |
|-----------------------|--|-----------------|
| | Authors | Approver |
| Name: | Paul Hutchinson | David Elliott |
| Signature: | | |
| Position: | Sustainability and Compliance Director | Chief Executive |
| Date: | 31/12/2022 | 31/12/2022 |

Signed Policies Are Available Upon Request