

## MODERN SLAVERY STATEMENT

This statement, which constitutes our Group's Anti-slavery and Human Trafficking Statement, for financial year ending 30<sup>th</sup> March 2025, is made pursuant to section 54 (1) of the Modern Slavery Act 2015.

This statement is made on behalf of each of Severfield plc, Severfield Commercial & Industrial Limited, Severfield (Design & Build) Limited, Severfield Modular Solutions Limited, Severfield Commercial & Industrial (NI) Limited, Severfield Infrastructure Limited, Severfield Nuclear and Infrastructure Limited, Severfield Europe B.V. and Severfield Europe Holding B.V.

### OUR COMMITMENTS AND VALUES

Integrity is one of our core company values and this means that we will conduct our business lawfully and ethically. In accordance with this core value, we are committed to:

- Ensuring that there is no human trafficking, exploitation and modern slavery within our supply chain or in any part of our business; and
- Implementing and enforcing effective systems and controls designed to address the risk of human trafficking and modern slavery.

This statement outlines the work we have undertaken to assess areas of risk, the measures we have put in place to reduce the risk of modern slavery in any part of our business, and the steps we will be taking in future in order to build on our approach.

We are committed to ensuring that there is no human trafficking and modern slavery within our supply chain or in any part of our business. Severfield will not support or deal with any business we know is involved in slavery or human trafficking.

### POLICIES

We recognise that modern slavery should not be addressed in isolation, but as part of a wider approach to tackle legal and regulatory breaches within the company or supply chain. Our policies are embedded within the business, form a central part of company induction, and are communicated internally through our intranet, while our key group policies are on our website. As such, aside from the Modern Slavery Statement itself, we have the following policies in place:

- Disciplinary Policy
- Grievance Policy
- Anti-bribery & Corruption Policy
- Social Media Policy
- Ethics Policy
- Whistleblowing Policy
- Fraud prevention Policy
- Ethics Policy
- Supply Chain Code of Conduct

These policies are made available to all employees when they join the company and are accessible to all through our intranet.

### TRAINING & AWARENESS

Our purchasing teams and individuals responsible for procurement and recruitment and policy compliance are given appropriate training on awareness of Modern Slavery and wider ethics so that they remain vigilant to the risk of any activities in our supply chain that contravene people's human rights.

We have implemented training across the workforce to increase awareness utilising our internal Learning

Management System (LMS), which is tested periodically. Training was supplemented by a response protocol to enable fast action setting out how to support suspected victims of modern slavery or human trafficking.

Our Modern Slavery Statement is referred to in our onboarding process and additional details on the reporting process of suspicion of modern slavery are included in site induction packs.

## RISK ASSESSMENT

In accordance with our Group procurement policy framework, we require, as part of our supplier accreditation process, all suppliers to confirm that they abide by the requirements of the Modern Slavery Act on an annual basis as part of a code of requirements ensuring that suppliers conduct themselves in a way which is consistent with our ethics policy.

We also share guidance with our key supply chain members on good practice for identifying and preventing modern slavery in their own supply chains.

We actively encourage all stakeholders to speak up if they are aware of malpractice. If we discovered, suspected or were made aware, that we had been associated with human rights violations, including any acts of modern slavery and human trafficking, we would take steps to investigate and, where necessary rectify the situation, taking account of the interests of those whose rights are being violated.

## DUE DILIGENCE

Our recruitment processes are transparent and reviewed regularly and we have robust procedures for vetting new employees and ensuring we can confirm their identities. We monitor our temporary work agencies to ensure legislative compliance and suppliers employing or providing non-UK nationals undergo appropriate investigation to understand their recruitment methods and their management of permits and working visas.

Our supply chain for Severfield Group is predominantly UK based (or mainland Europe for our European entities) and we believe that the risk of human rights violations, including any acts of modern slavery and human trafficking, in our supply chain is low. In making this assessment we have considered any sector, transaction and country specific risks in accordance with good practice and have implemented the guidance provided by the Supply Chain Sustainability School.

## SUMMARY

The Company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is prevented from taking place within the organisation and within its supply chains.

This statement will be reviewed annually, unless circumstances dictate it should be reviewed and/or renewed more frequently.

Date 14<sup>th</sup> April 2025

A handwritten signature in black ink, appearing to read 'Mark Sanderson', with a long horizontal stroke extending to the right.

Signature

Mark Sanderson- Company Secretary Severfield plc