

**This Policy applies to Galliford Try Holdings Plc ('Galliford Try') and INCLUDES, Morrison Construction Limited, Galliford Try Construction Limited, Galliford Try Infrastructure Limited, Galliford Try Facilities Management Limited, Oak Specialist Services Limited, Lintott Control Systems Limited, Ham Baker Engineering Limited, AVRS Systems Limited, and all subsidiaries.**

## 1. Foreword

At Galliford Try, we recognise that modern slavery and forced labour are serious violations of fundamental human rights. We have a responsibility to ensure that our operations and supply chains are free from exploitation and uphold the highest standards of ethical conduct.

Our commitment goes beyond compliance with the Modern Slavery Act 2015. We strive to create a culture of transparency, accountability, and respect across all aspects of our business. This means working collaboratively with our employees, subcontractors, and suppliers to identify risks, implement robust controls, and continuously improve our practices.

The construction sector faces unique challenges due to its complex supply chains and reliance on diverse labour sources. We take these challenges seriously and have embedded measures to prevent, detect, and address any form of forced labour or unethical practices. Through rigorous due diligence, training, and supply chain engagement, we aim to protect vulnerable individuals and promote fair treatment for all.

This statement has been published in accordance with section 54 of the Modern Slavery Act 2015 and constitutes Galliford Try's anti-slavery and human trafficking statement for the 2024/25 financial year which ended on 30 June 2025. It sets out our ongoing efforts to prevent modern slavery and human trafficking in our business and supply chain, and outlines the steps we are taking to strengthen our approach year on year. We remain committed to driving positive change within our industry and ensuring that human rights are respected throughout our business and supply chain.

## 2. Organisation structure, business and supply chains

Galliford Try is one of the UK's leading construction groups, operating exclusively within the United Kingdom. Our business is structured around three core divisions:

*Building* - Delivering new build, refurbishment, and fit-out projects across key sectors such as education, healthcare, defence, custodial and judicial, affordable housing and commercial property.

*Infrastructure* - Focused on highways and environmental projects, including major civil engineering works and water sector programmes. This division works closely with regulated utilities and public bodies to maintain and upgrade critical national infrastructure.

*Specialist Services* - Providing fire protection, cladding, security systems, digital infrastructure, and facilities management, across our core sectors.

Our projects are typically secured through long-term frameworks with public sector clients, including central government Departments and Ministries, the NHS, National Highways, Crown Commercial Services, and UK

regulated water and utilities companies. This approach ensures predictable demand and fosters collaborative relationships.

We employ circa 4,400 employees and operate through a network of regional offices across the UK, enabling us to combine national capability with local delivery.

Across all of our divisions, the vast majority of projects are delivered in partnership with our supply chain, which is extensive and diverse, reflecting the complexity of the construction industry. It includes subcontractors, material suppliers, plant providers, contingent workers, and specialist service partners. An approximate breakdown of the relative procurement spend by supply chain category is shown below:

- Subcontractors 78%
- Materials 7%
- Contingent Workers 5%
- Plant and equipment hire 5%
- Other 5%

We adopt a two-tier procurement model:

*Local subcontractors and suppliers* - Supporting regional economies and ensuring responsiveness to project needs.

*Group preferred suppliers* - Providing key materials and services under national agreements to maintain consistency and quality.

We have been operating our Advantage through Alignment programme, which builds long-term partnerships with our subcontractors, since 2016. Our aligned subcontractors commit to shared values on safety, sustainability, and workforce welfare. In addition, we engage suppliers through training, workshops, and industry initiatives such as the Supply Chain Sustainability School. In 2026, as part of the refresh of Advantage through Alignment, we invited our supply chain to a conference to discuss the fostering of improved relationships as we deliver our Sustainable Growth targets to 2030.

We recognise that the scale and complexity of our supply chain can present risks of modern slavery and human trafficking. Our approach is to identify and mitigate these risks through robust due diligence, contractual requirements, and ongoing engagement. We expect all suppliers and subcontractors to uphold the same high standards of integrity and respect for human rights that we apply within our own operations.

### 3. Organisational policies

#### ***Doing the Right Thing – Our Code of Conduct***

At Galliford Try, our purpose is to improve people's lives through building the facilities and infrastructure that communities need, providing opportunities for our people to learn, grow and progress, working with our supply chain to promote the very best working practices and caring for the environment in which we work. We do this by holding true to our values, delivering Excellence for our clients and the community, being Passionate about our role in providing vital services, putting Integrity at the heart of our business by doing the right thing, and Collaborating with our clients and supply chain to deliver for our stakeholders.

Our Code of Conduct sets out what doing the right thing means to us by outlining our strong ethical standards and providing a framework to ensure we behave in a way that reflects our purpose, vision and values including our environmental, social and governance responsibilities.

The Code of Conduct includes a section on respecting human rights, in which we confirm our commitment to upholding human rights for our people and those who work with us, and outline the steps we take to prevent slavery and human trafficking from taking place in our business and supply chain. These include:

- Prohibiting the use of forced labour.
- Verifying that all direct employees have the right to work in the UK when they start their employment.
- Making all employees aware of their working hours, leave and absence entitlements and other employment benefits.
- Complying with minimum wage and minimum age requirements.
- Requiring suppliers to have procedures in place to minimise the risk of recruiting forced or compulsory labour.
- Leading by example, embracing our vision and values.
- Ensuring we understand and comply with all relevant laws, policies and procedures.
- Speaking up if we see or suspect wrongdoing.

This section also identifies some of the signs where workers may be victims of modern slavery that our people should look out for, including:

- Wearing the same clothes every day or wear unsuitable clothes for work.
- Being dropped off and collected for work, especially at unusual times.
- Not having personal identification on them.
- Having few personal belongings.
- Being reluctant to talk to others.
- Appearing frightened, withdrawn or show signs of physical or psychological abuse.
- Appearing to be under the control of someone else.

As well as having a duty to do the right thing, the Code of Conduct also sets out the importance of speaking up if we see or suspect wrongdoing or any breaches of the Code or our policies and procedures. (This is covered in more detail in our Whistleblowing policy below).

### ***Resourcing policy***

Our Resourcing Policy sets out a framework to ensure that we select and recruit employees with the right mix of skills and experience, and also meet the requirements of all relevant employment legislation. The policy includes the following requirements that are relevant to managing the risk of modern slavery:

- No offer of employment will be issued until the HR Hub team have been provided with satisfactory evidence of Right to Work in the UK.
- All new employees will be required to complete the mandatory e-learning compliance training within their first two weeks of employment.

- All new employees will be invited to attend the Corporate Induction within their first few months of employment (see below for further details).

### ***Responsible Sourcing policy***

Our Responsible Sourcing Policy sets out our commitment to selecting, supporting, and collaborating with Suppliers that are taking steps to address a broad range of sustainability issues. This includes contractually requiring our suppliers to have the following procedures in place as part of our standard pre-qualification questionnaire process for Group preferred suppliers:

- Policies or procedures covering employee rights to work in the UK, employee rights (e.g. working hours, benefits, and training), equality/diversity, grievance/whistleblowing and payment of the real living wage, and
- Procedures to reduce the risk of modern slavery (including forced, compulsory and child labour) occurring in their supply chain.

### ***Whistleblowing policy***

Our whistleblowing policy confirms our commitment to promoting a culture of openness, allowing all our people, and those in our clients and supply chain to raise and resolve any ethical issues or problems as quickly as possible.

The policy provides examples of the malpractice or ethical concerns that should be reported through the whistleblowing process, which specifically include breaches of human rights, including slavery. It also sets out the different routes available for reporting issues, including 'Safe Call'. The Safe Call hotline is a safe, independent and confidential service through which individuals can report their concerns, including anonymously. We raise awareness of the hotline and promote its use through our induction programme, intranet, and through posters that are prominently displayed on our sites. A summary of all incidents raised through the hotline and the results of subsequent investigations is reported to and reviewed by the Audit Committee three times a year.

## **4. Assessing and managing risk**

We have assessed the risk of modern slavery and forced labour in our own operations and supply chain and identified four broad categories of workers who could be at risk:

### ***Employees***

The people who we employ directly could be at risk of modern slavery, but we consider the risk to be very low given the risk mitigation measures we have in place. These include:

- We verify that all direct employees have the right to work in the UK prior to any formal offer of employment being made.
- We make all employees aware of their working hours, leave and absence entitlements and other employment benefits via their contract of employment.
- We prohibit the use of forced labour in our Code of Conduct (Doing the right thing) and make training on modern slavery available to all employees.

## **Agency Workers**

In addition to directly employed workers, we also use workers who are provided through labour agencies. Although these workers are managed by Galliford Try employees, they are employed by the labour agencies. We therefore consider the risk to be slightly higher because we are reliant on third parties to have procedures in place to prevent modern slavery and forced labour. We seek to mitigate the risk by:

- Only engaging agency workers who are provided by suppliers on our Preferred Supplier List.
- Requiring all Preferred Suppliers to complete pre-qualification questionnaires including attestations of policies existing on:
  - Agency workers have the right to work in the UK
  - Not charging workers a work finding fee
  - Have procedures in place to minimise the risk of recruiting forced or compulsory labour

See section 5 Due Diligence for further details of our contingent worker preferred supplier audit programme.

## **Subcontractor workers**

Similar to agency workers, subcontractor employees are not directly employed by Galliford Try. However, we consider the risk of modern slavery and forced labour to be higher because, unlike agency workers, subcontractor workers are not typically managed by Galliford Try employees. Subcontractors may also sub-contract elements of their work, and within some trades, use temporary and/or unskilled labour. We seek to mitigate the risk by:

- Considering subcontractors approaches to employee rights and any breaches of human rights related legislation during our selection process.
- Requiring all site-based operatives to provide evidence of their CSCS cards.

See section 5 'Due Diligence' for further details of the contractual terms and conditions we require all our subcontractors to adhere to.

## **Materials supply chain**

We have assessed the greatest risk of modern slavery and forced labour to exist within the extended supply chain relating to the building materials and other manufactured products that we use on our construction projects and within our own operations. The potential risks are greater due to a number of factors, including:

- Long and complex supply chains, especially for manufactured products, make visibility more difficult.
- Potential for production/manufacture in countries or regions where there is a greater risk of modern slavery and forced labour.
- The majority of materials are procured indirectly through subcontract packages of work.

We seek to mitigate the risk by:

- Procuring the majority of our materials from UK based organisations that are required to comply with UK law on forced labour.
- Where materials are sourced from outside of the UK, we are working to improve identification of slavery and human trafficking risks as part of our selection process.

See section 5 'Due Diligence' for further details of the contractual terms and conditions we require all our suppliers to adhere to.

## 5. Due diligence

Our subcontractor and supplier procurement processes include proportionate measures to address the risk of modern slavery and forced labour in our supply chain. These include measures at the supplier selection stage and when we enter into contract.

### ***Subcontractor onboarding***

In order for our businesses to enter into contract with subcontractors, they must go through the subcontractor onboarding process. To support this process, we have implemented a new supplier onboarding system which aligns to the Common Assessment Standard (CAS). The CAS was developed by Build UK, the Civil Engineering Contractors Association, and other assessment bodies, standardises the pre-qualification process across the industry, and helps subcontractors demonstrate compliance against 10 risk management themes. Within the Corporate and Professional Standing theme, subcontractors are required to provide evidence to support their answers to the following questions:

- Does your company have an Anti-Slavery and Human Trafficking Statement or Policy?
- Does your company communicate its Anti-Slavery and Human Trafficking Statement or Policy to its workforce?
- Does your company ensure that your supply chain is aware of, and abides by, the Modern Slavery Act 2015?

### ***Subcontract and supplier agreements***

We provide contractual rigour to our approach to preventing modern slavery and forced labour through contractual clauses that apply to all subcontractors and suppliers. These requirements seek to ensure that our partners operate to the same standards that we set for ourselves.

All subcontract and supplier agreements mandate compliance with the Modern Slavery Act 2015. Subcontractors must also ensure that their own supply chains, including all sub subcontractors, adhere to these same obligations.

To support this, our contracts require subcontractors and suppliers to:

- Implement due diligence procedures across their supply chains to identify, mitigate and prevent modern slavery and trafficking risks.
- Respond promptly to any modern slavery-related enquiries or information requests we issue.
- Provide slavery and trafficking reports, upon request, detailing the steps they have taken to ensure their operations and supply chains are free from exploitation.
- Maintain full traceability records for all labour, materials and services used in the delivery of their works.
- Deliver appropriate training to their employees to support compliance with the Modern Slavery Act 2015.

Suppliers must also warrant that they operate in full compliance with relevant legislation, that the information they provide through due diligence processes is complete and accurate, and that neither they

nor any part of their supply chain have been convicted of, or investigated for, modern slavery or human trafficking offences.

Contractors are required to notify us immediately if they become aware of any breach, actual or potential, of the Modern Slavery Act 2015, our policy, or any suspected instance of slavery or trafficking within their supply chain. They must fully cooperate with any resulting investigation and allow us access to relevant records for audit purposes.

Where a breach is identified, we reserve the right to:

- require the removal of any subcontractor, supplier, employee or other individual associated with the breach; or
- terminate the contract with immediate effect.

These contractual provisions form a core part of our wider due diligence framework and help ensure that all work undertaken on our behalf upholds the highest ethical standards.

### ***Contingent worker preferred supplier audit programme***

In 2024, we initiated a programme of auditing our contingent worker preferred supplier agencies using a specialist third party audit firm. The initial wave of audits covered all 36 labour agencies and did not identify any compliance issues in relation to modern slavery or right to work checks.

In 2025, we performed further, more detailed audits, of five agencies. The audits covered the following key areas:

#### ***Governance & Organisational Responsibility***

- Confirmed the presence of a designated Head of Governance with strategic oversight of modern slavery compliance.
- Reviewed organisational structure and role-specific responsibilities including policy development, supply chain risk management, training delivery, and stakeholder engagement.

#### ***Policy & Legal Compliance***

- Verified that suppliers had a signed and published Modern Slavery Statement aligned with Section 54 of the Modern Slavery Act 2015.
- Examined internal policies, including the Modern Slavery & Human Trafficking Policy and Code of Ethics.

#### ***Training & Awareness***

- Reviewed evidence of mandatory training programmes for all staff, including toolbox talks, induction modules, Fairness, Inclusion and Respect ambassador initiatives, and refresher sessions covering International Labour Organisation indicators and reporting pathways.

#### ***Risk Assessment & Supply Chain Due Diligence***

- Assessed the company's supply chain mapping and risk profiling activities via its LEAF compliance platform.

- Evaluated supplier onboarding protocols, including ethical declarations, right-to-work checks, and evidence of subcontractor controls.
- Confirmed continuous improvement activities and internal system alerts for red flags.

#### *Audit, Monitoring & Employee Engagement*

- Inspected evidence of internal audits, Achilles Ethical Employment accreditation, and worker engagement surveys.
- Noted that findings are formally reviewed by the Board and integrated into improvement actions.

#### *Whistleblowing & Grievance Mechanisms*

- Validated the existence of independent whistleblowing and grievance channels for both employees and supply chain workers.

#### *Payroll & Employment Checks*

- Reviewed anonymised payroll records for indicators of exploitation (e.g. duplicate bank details).
- Confirmed contract fairness, direct payment practices, and wage compliance.

#### *Commitment to Continuous Improvement*

- Audited measures such as policy review cycles, technology-driven compliance monitoring (LEAF), supplier engagement activities, and third-party collaborations with groups like the Gangmasters and Labour Abuse Authority and the Supply Chain Sustainability School.

The audits performed in 2025 did not identify any compliance issues in relation to modern slavery or right to work checks.

We have now initiated a rolling programme of audits, covering five agencies each quarter.

#### **Factory visits**

We also work closely with our manufacturing, material and plant suppliers to reduce risk and add value to our projects ensuring they have robust procedures in place to manage the risk of modern slavery. To support this further, we carry out factory visits to our manufacturing, material and plant hire supply chain reviewing working conditions and facilities provided for their workers.

## **6. Training**

We provide to our employees and those working for our supply chain partners, on what modern slavery is, how to identify the signs of modern slavery, our policy, and how they should report any concerns. This is provided through a number of different routes.

#### **Induction**

All new employees are required to read and confirm understanding of the Code of Conduct as part of their induction programme. As outlined in section 3 above, our Code of Conduct includes a section on respecting human rights, in which we confirm our commitment to upholding human rights for our people and those

who work with us, and outline the steps we take to prevent slavery and human trafficking from taking place in our business and supply chain. These include:

- Prohibiting the use of forced labour.
- Verifying that all employees have the right to work in the UK when they start their employment.
- Making all employees aware of their working hours, leave and absence entitlements and other employment benefits.
- Complying with minimum wage and minimum age requirements.
- Reporting concerns.

### ***Active bystander***

In support of our Doing the Right Thing code of conduct, we have developed and rolled out Active Bystander workshops for all of our employees and contingent workers. The workshops are intended to promote a culture of speaking up by creating a safe environment where our people feel confident in calling out behaviours that are contrary to our code of conduct, including in relation to modern slavery. The sessions cover:

- Understanding what an Active Bystander is.
- Recognising inappropriate behaviour/language.
- Intervening safely and effectively.
- Supporting colleagues in a constructive way.
- Understanding Galliford Try's values and expectations.
- Reporting concerns.

### ***Supply Chain Sustainability School***

We are partners in the Supply Chain Sustainability School ("the School") and our Group Supply Chain & Procurement Director is one of the School's Board Members. The School is an award-winning virtual learning platform covering a range of sustainability topics, with the aim to upskill those working within, or aspiring to work within, the built environment sector. We encourage our own staff and those of our suppliers/subcontractors to complete learning modules on various topics, including modern slavery. These modules cover a wide range of issues in relation to combating modern slavery, including governance, risk assessment, due diligence, and reporting.

In the calendar year 2025, our subcontractors accessed the School's modern slavery resources 2,167 times, (2024: 2,144) with a cumulative time spent of 1,310 hours (2024: 383 hours).

### ***Industry collaboration***

In March 2025, we collaborated with Unseen, a UK anti-slavery charity and 11 industry peers and labour suppliers to create a short film designed to raise awareness of modern slavery in the construction industry. Launched during Anti-Slavery Week, the film featured the story of a site worker subjected to labour abuse who had gone unnoticed by many of his colleagues.

## 7. Monitoring and evaluation

### Modern Slavery Working Group

We have a Modern Slavery Working Group to monitor our compliance with the requirements of the Modern Slavery Act 2015, and more generally, to oversee the actions we are taking to enhance our approach to managing the risks of modern slavery in our operations and supply chain. The group, which meets three times a year is chaired by the Director of Sustainability and comprises representatives from different disciplines across the business, including group procurement and supply chain, HR and pre-construction.

### Modern Slavery Assessment Tool (MSAT)

We have adopted and use the UK Government’s Modern Slavery Assessment Tool (MSAT) as a core element of our monitoring and evaluation process. The MSAT is a Home Office–developed assessment framework that enables public sector suppliers to demonstrate the effectiveness of their policies, governance, recruitment practices, supply-chain controls, worker protections, and training measures in preventing modern slavery. While not legally mandated, MSAT is strongly encouraged across the UK public sector, and is increasingly required by our clients in central government departments, local authorities, and Crown Commercial Service frameworks.

The tool provides a consistent, evidence-based mechanism for identifying risk areas and performing a self-assessment of our performance across key domains including responsible recruitment, grievance mechanisms, supply-chain mapping, subcontractor oversight, and ongoing monitoring. Automated recommendations generated through MSAT help us strengthen our controls and support continuous improvement.

### Key Performance Indicators

We currently use the following KPIs to help us monitor the effectiveness of the mitigation measures we have in place to manage the risk of modern slavery.

Key performance indicator	2025	2024
Whistleblower reports relating to modern slavery	0	0
Contingent Worker labour agency audits performed <sup>1</sup>	5	36
Supply Chain Sustainability School modern slavery resources accessed	2,167	2,142
% of business unit core trades spend with aligned subcontractors	59%	61%

1. As noted above, the initial wave of audits performed in 2024 covered all 36 labour agencies. We performed further ‘deep dive’ audits of five agencies in 2025. From 2026, we will have a rolling programme of audits, covering five agencies each quarter.

### 8. Looking forward

Our objective over the next 12-24 months is to continue to bring greater structure and rigour to how we identify and manage the risk of modern slavery in our operations and supply chain. Key actions that are either underway or we are planning to take include:

- Reviewing and refreshing the ongoing training provided to our staff.
- Reviewing and documenting in more detail our key modern slavery risks and mitigations.
- Reviewing our existing KPIs, and if appropriate, identifying additional appropriate KPIs to support ongoing monitoring of our modern slavery risks and the effectiveness of our mitigation measures.
- Continuing the programme of contingent worker preferred supplier audits, and expanding the scope to include questions on debt bondage.

### 9. Registration and sign off

We participate in the UK Government Registry of Modern Slavery Statements. This statement is registered and will be reviewed and updated as necessary on at least an annual basis. It is also available in the policies section of our website <https://www.gallifordtry.co.uk/investors/governance-policies/>

This statement was reviewed and approved by the Executive Board on 19<sup>th</sup> February 2026. Accountability for compliance with this statement rests with the Executive Board.

Signed for, and on behalf of, the Executive Board:



**Bill Hocking**  
**Chief Executive**  
**Galliford Try Holdings plc**