Modern Slavery & Human Trafficking Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Group recognise that modern slavery and human trafficking is a violation of fundamental human rights and is contrary to the Modern Slavery Act 2015 (the “Act”).

The Group have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

The Group will take steps to ensure that modern slavery and human trafficking are not taking place in its own business, or within any of its supply chain. This will be achieved by ensuring that:

- All recruitment is carried out in a fair and transparent manner and will comply with relevant legislation and standards.
- The requirements and expectations made of the supply chain in relation to the Act will be clearly communicated and included within any contractual terms issued to them.
- Suppliers will be expected to comply with the Immigration, Asylum and Nationality Act 2006, and must comply and act in accordance with this Policy.
- The Group will take a partnership approach with regards to working with its suppliers to combat the threat of modern slavery and human trafficking across its sectors and all the industries in which it operates.
- The Group will train appropriate staff to understand the risks and issues surrounding modern slavery and human trafficking, how to identify it and appropriate measures to prevent it.

This policy applies to all persons working for us, or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided, as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Every Group employee has an individual responsibility to ensure compliance with this Policy, including being alert to the risk of such unlawful practices. We consider a breach of this Policy as a serious offence, and any violation of this Policy, or the Act by an employee will result in disciplinary action, up to and including dismissal in appropriate circumstances. In addition, we will notify the relevant authorities of an individual, or a supplier's contravention of the Act.

This Policy will be reviewed annually to ensure that it reflects current legislation and regulations.

Signed

A P Rimoldi
Group Chief Executive

February 2025

Issue No.	*Date*	*Amendments*
1	*March 2017*	*Initial issue (non-mandatory due to turnover criteria)*
2	*February 2019*	*Policy, statement and procedures developed following increase in turnover*
3	*February 2022*	*Policy updated following Covid year when turnover dropped below reporting levels*
4	*November 2022*	*Statement revised following financial year 2021/2022*
5	*October 2023*	*Reviewed and revised following financial year 2022/2023*
6	*September 2024*	*Reviewed and revised following financial year 2023/2024*
7	*October 2025*	*Reviewed and revised following financial year 2024/2025*

Modern Slavery and Human Trafficking Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015. It sets out the Centura Group's actions to understand potential modern slavery risks related to its business and to put in place steps aimed at minimising this risk.

This mandatory statement issued by Centura relates to business dealings during the **financial year 1st July 2024 to 30th June 2025.**

Our Commitment

As part of the specialist construction industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking risks. The Centura Group is absolutely committed to preventing slavery and human trafficking in its corporate activities and its supply chain.

Reports and issues dealt with in 2024-25

There were no allegations or reports of potential modern slavery in the financial year 2024-25.

Company Structure and Supply Chains

The Centura Group employs over 360 people and comprises the following companies:

Concrete Repairs Limited (CRL)	was founded in 1954 as a specialist contracting company and accounts for roughly 90% of the value of the Group. Over the past 70 years the business has maintained this specialist classification providing a comprehensive asset management and maintenance service to various private and public clients. CRL operates in various sectors, including highways, marine, water, heritage, car parks, building and rail.
CRL Surveys	undertakes condition surveys and reports of existing concrete structures.
F J Samuely and Partners	is a structural Consulting Engineer. *[Left the Centura Group 01 August 2024]*
Lifespan Structures	designs, manufactures and supplies FRP composite bridge decks.
Centura	centrally manages HR, finance and training functions for the Group.
Remedial and Surveys PTY LTD	founded in 2024, is an Australian asset repair company that specialises in condition surveys and concrete repairs. *[Joined the Centura Group 09 October 2024]* The statement does not currently cover the activities of this company.

We work with over 800 suppliers including consultants, specialist material manufacturers, subcontractors and labour agencies.

Countries of Operation and Supply

Centura's workload is almost entirely within the United Kingdom, other than the Australian branch of CRL.

Risk Assessment of Current Activities

The following activities are considered medium risk of slavery or human trafficking:

- The use of agency workers for labour intensive activities.
- Subcontractor packages with high labour content, especially where overseas operatives may be used – this tends to be most relevant to CRL's operations.
- The source of raw materials for the products we use, where materials are obtained and what the slavery and human trafficking situation is in these areas/companies. Potential higher risk materials identified are anodes that require specific metals for manufacture and are often imported from around the world.

Procurement and our Supply Chain

We believe the highest potential risk sits within our supply chain. Most of our products and services are purchased from UK or EU based firms who are also required to comply with the requirements of the UK Modern Slavery Act, 2015 or similar legislation in EU states.

Where possible we build longstanding and collaborative relationships with our suppliers to ensure they align with our values and that they are aware of our commitment to protect human rights. As part of our procurement approval process, we ask our suppliers to provide information about their own Modern Slavery policies and arrangements regardless of whether modern slavery is deemed to be a high risk in the procurement of a specific product or service.

80% of our supply chain have a Modern Slavery policy.

Responsibility

Responsibility for the Company's anti-slavery and anti-human trafficking initiatives is as follows:

- **Policies**: The Board of Directors is responsible for putting these policies and procedures in place. In order to do so, the Board will rely upon Directors and Senior Management to review company processes and in its supply chains. The Board of Directors is responsible for reviewing this policy in line with current requirements (legislation and PPN).
- **Risk Assessments**: The responsibility for human rights and modern slavery risk analysis lies with the Directors and Senior Managers within the company.
- **Training**: Awareness and employee responsibilities training will be organised by the Training Manager.

Relevant Policies

We operate the following policies that refer to our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations. These documents are held in the Centura Document Library:

- **Modern Slavery and Human Trafficking Policy**
- **Whistleblowing Policy**
- **Recruitment and Selection Procedure**
- **Dignity at Work Policy**
- **Equality & Diversity Policies**
- other written practices and procedures which ensure fair recruitment and treatment of employees

Directors and Senior Management will revisit and develop these policies and procedures regularly and initiate any necessary revisions.

Training

We propose to increase awareness by way of a combination of:

- Organised training
- Toolbox talks
- Induction training
- Signage, Posters and access to other information (at our offices and worksites, on company intranet)
- Consultation meetings
- Focussed awareness and information share with Supply Chain
- Stand down and supply chain days which will include focus on Modern Slavery issues.

Due Diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence and risk management measures include:

- Consider the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- Request information from our supply chain in relation to their modern slavery and human trafficking policies and procedures.
- Use of online sites including Companies House and UKAS Cert Check to check member information.
- Credit Checks.
- Employee awareness of modern slavery and human trafficking.
- Supply chain awareness of modern slavery and human trafficking.

2024-25 Progress

Training for all	The Company requires its key staff to complete specific training on modern slavery. Over the last year this training has included: • Modern Slavery module from provider iHasco on our eLearning programme (this is included as standard in staff training plans). • 100 Modern Slavery eLearning courses had been completed over the year: 36 Managers 32 Site Supervisors 32 Operatives, Office and support staff This is more than a quarter of our employees and is more than double the previous year. • 7 Supply Chain Sustainability School [SCSS] Modules on Modern Slavery were completed. • Further awareness for those directly involved with the subcontractor procurement process. • Promoting the free resources within the Supply Chain Sustainability School, in particular modern slavery resources, both internally and to our supply chain.
Targeted Modern Slavery **training** for Site Management	Held a bespoke on-site training Workshop, delivered by SCSS, attended by 19 managers 6 commercial staff (QS, Buyer)
Continued **review of our supply chain verification**	In the last financial year we have brought in additional permanent and specialist consultant resource to support our ESG development and due diligence of the supply chain.
Procurement Working Groups	Monthly meetings held for Subcontractor, Buyers, and Supplier Approval communities to discuss key issues and development.

Self-assessment	Used the National Highways Supplier Development System to measure our maturity and identify areas for improvement.

Key Actions Planned for the 2025-26 Year

- Review of our **global material supply chain** and Modern Slavery risks, eg producers of anodes.
- Supply Chain mapping.
- Provide internal **guidance** for what to do if you think someone is at risk.
- Continue Modern Slavery **training** and awareness.
- Continue **review of our supply chain verification** to identify any additional opportunities to evaluate both existing and potential suppliers.

- Align with current TISC requirements and PPN 009 Guidance, including:
  - Review how we **identify and manage risks** in both new procurement activity and existing contracts
  - Develop how we assess the risk of modern slavery in procurements, noting characteristics and current key sectors of concern
  - Ensure we have a mechanism to provide supply chain information for new procurements designated as having a high risk of modern slavery
  - Review enhanced due diligence activities and exclusion grounds

Board Approval

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Centura's slavery and human trafficking statement for the financial year ending 30 June 2025.

This Statement was approved by the Board and signed on its behalf by the Group Chief Executive on 30th October 2025.

Signed

A P Rimoldi
Group Chief Executive