# MODERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

Lanes Group is a leading provider of utilities and infrastructure services in the UK and Ireland. The Group serves a broad range of sectors, and its specialist subsidiaries and service divisions support industries including water and wastewater, construction, highways, and rail.

This policy applies to Lanes Group and its subsidiary companies in the UK and Republic of Ireland, including Sapphire Utility Solutions Limited, Lanes for Drains Limited, Lanes-I Limited, UKDN Waterflow (LG) Limited, Clear-Flow Limited, S & C Foster Limited and AQS Environmental Solutions. It applies to their business activities wherever undertaken.

In establishing this policy, Lanes Group is committed to preventing and reducing the risks of modern slavery, human trafficking and exploitation in its operations and supply chain. The Group commits to acting ethically and with integrity and taking proportionate steps to identify and mitigate risks. It adopts a zero-tolerance approach to inaction or concealment. The Group also recognises that identifying and addressing concerns transparently is as important as preventing them.

This policy statement separates the Group's standing policy and recorded results for the required reporting year.

## 1. Policy

### Purpose

Lanes Group acknowledges its responsibilities under the Modern Slavery Act 2015 in the UK, the Human Trafficking and Exploitation (Scotland) Act 2015 for Scottish operations, and the Criminal Law (Human Trafficking) Act 2008 in the Republic of Ireland, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013. This policy sets out the Group's commitments and controls; the annual-results section records the performance information available for the UK annual statement as per the reporting period. The Group seeks transparency in its operations and supply chains, including suppliers of goods and services.

Modern slavery includes slavery, servitude and forced or compulsory labour. Human trafficking involves recruiting, moving, harbouring, or receiving people for exploitation, including through coercion, deception, or force. People affected may include children as well as adults and may have been brought from overseas or may already live in the UK or Ireland. The Group's focus is on preventing exploitation and responding to concerns.

### Organisational Structure & Responsibilities

Lanes Group is committed to acting ethically and with integrity in all its business dealings and relationships, and taking appropriate and proportionate steps to ensure acts of modern-day slavery and human trafficking do not occur within its business or from within its supply chains, including suppliers, contractors, sub-contractors, and partners.


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Directors, senior management, and managerial staff are responsible for implementing this policy and providing adequate resources, investment, information, instruction, monitoring, and reporting. Everyone working for, with or on behalf of the Group is responsible for preventing, detecting, and reporting suspected modern slavery or human trafficking. They must not engage in or facilitate exploitation or fail to report suspected breaches. The Group will take appropriate action where individuals or organisations breach this policy.

The Lanes Group designated Modern Slavery Working Group (MSWG) is appointed by the Lanes Group Board of Directors and is a cross functional working group with representation from procurement, HR, compliance, and ESG. The MSWG is responsible for documenting and reviewing performance against the policy; including commitment to prevent risk of modern slavery and human trafficking, and that the Group processes provide assurance that relevant laws, regulations, and industry standards are upheld.

Where Lanes Group acquires another organisation, this policy shall apply to its operations and a compliance check against the requirements of the policy shall be undertaken within the first 100 days.

## Supply Chains and Supply Chain Due Diligence

Lanes Group is committed to developing a consistent, proportionate and risk-based approach to modern slavery due diligence across its supply chain. Implementation is ongoing, and the Group recognises gaps in supplier onboarding, documentation, and monitoring. Procuring products, services and labour can expose the Group to slavery and human trafficking risks, with some industries presenting higher risks. The procurement improvement programme will strengthen these controls, prioritising review of suppliers and subcontractors presenting higher risks.

Goods, services, and labour sourced from all locations, including the UK, EU and other countries, will be subject to proportionate, risk-based assessment to identify, prevent, and mitigate modern slavery and human trafficking risks through the pre-qualification questionnaire and review process. This is a policy requirement being implemented; it does not mean that every supplier has already been assessed.

The Group focuses on prevention and will not knowingly facilitate modern slavery or human trafficking. Where concerns arise about a business relationship, the Group will apply the safeguarding, remediation and responsible engagement principles set out in this policy. Supplier contracting and due diligence are intended to manage and mitigate supply-chain risks. The Group is committed to engaging with stakeholders and suppliers and working with clients to reduce these risks via a preventative and collaborative approach.


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## Supplier Vetting and Management

Supplier onboarding and qualification are being strengthened across the Group. The Group Procurement Strategy in development will establish an objective plan to re-engineer and automate onboarding process. This will include a review of the existing seven-tier supplier categorisation process and move to risk-based monitoring.

Constructionline is used to support aspects of supplier and subcontractor qualification. Registration does not, by itself, demonstrate compliance; outstanding requirements and supporting evidence require review and follow-up. The Group plans to make fuller use of Constructionline to support its onboarding programme.

The Group will strengthen supplier records and purchasing controls to support consistent onboarding and approval before engagement. The completeness, accessibility and operation of the internal approved-supplier system require validation. Suppliers and subcontractors can currently be engaged without completing onboarding; addressing this gap is part of the procurement improvement programme. A mandatory pre-engagement approval rule and any exceptions process remain proposed controls requiring approval.

All employees are required to follow the 'Supplier & Subcontractor Onboarding' process map with regard to supply chain queries.

Findings will be recorded and appropriate actions assigned and followed up. Relevant stakeholders will be informed of the steps being taken to address modern slavery risks. As a supplier, Lanes Group will cooperate with its clients' modern slavery and human trafficking requirements and audits. Client audits of Lanes Group are distinct from supplier audits undertaken by the Group. Audit sources, scope, findings, and action status will be documented in the Modern Slavery Compliance Plan, with relevant supplier-onboarding actions cross-referenced to relevant contract improvement plans once supporting evidence has been confirmed.

## Training & Awareness

Lanes Group raises awareness on modern slavery and human trafficking issues through:

- Management – Any modern-day slavery concerns should be raised to the Lanes Group MSWG via SpeakUp@lanesgroup.co.uk or via the Whistleblowing Policy.
- Communication – The policy is reviewed annually and communicated through staff noticeboards, the Integrated Management System (IMS), annually updated toolbox talks and the company website. The existing statement for the required publication year is available through the UK Government website.
- Learning and Training – Modern Slavery e-learning modules and toolbox talks, and mandatory induction modules.


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- Monitoring - Modern Slavery questions are integrated into the internal IMS audit question set to monitor and measure the understanding of modern-day slavery across Group operations.

## Monitoring Effectiveness

The Group monitors employee management and leadership e-learning completion rates, reported human-rights incidents and investigations, open corrective actions, and audit improvement opportunities.

Supplier approval, review, and supply-chain risk assessment monitoring is to be strengthened through the procurement improvement programme. Where relevant, engagement and awareness training with suppliers will be reported separately from employee training and only where participation can be evidenced going forward. Findings and stakeholder feedback inform improvement actions.

Modern slavery risks and improvement objectives are included in the Group Modern Slavery Compliance Plan, which is reviewed at least annually and when relevant legislation changes.

## Reporting

Lanes Group encourages employees, workers, suppliers, and partners to raise any concerns.

A whistleblowing policy is in place to support concerns being raised without fear of reprimand. If you suspect that someone might be a victim of modern slavery or human trafficking or any issues have been identified, please contact SpeakUp@lanesgroup.co.uk or follow the whistleblowing process for anonymous and confidential reporting.

Where the usual reporting recipient is implicated, concerns may be raised directly with a member of the MSWG or, where a member of the MSWG is implicated, with a member of the Board/Legal Counsel who is not implicated. This does not restrict reporting to an appropriate external authority.

## Resources

The following resources are available to support victims of modern slavery:

**Modern Slavery Helpline** is based in the UK and provides information, advice, and guidance about modern slavery issues during working hours.

- Telephone: 0800 012 1700
- Website: https://www.modernslaveryhelpline.org


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**The Salvation Army** offers a 24/7 confidential referral advice line.

- Telephone: 0800 808 3733
- Website: https://www.salvationarmy.org.uk/modern-slavery

**GOV.UK Resources** provide statutory guidance on identifying and supporting victims of modern slavery, including the process for determining victim status.

- Website: Visit the GOV.UK modern slavery guidance page.
- https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims

## Labour Standards, Due Diligence and Response to Modern Slavery

Lanes Group prohibits slavery, servitude, forced or compulsory labour and human trafficking in its operations and supply chains. These standards apply to the Group's employment practices and are expected of suppliers, subcontractors, employment agencies, and employment businesses supplying temporary labour. The following requirements apply to reduce these risks:

### 1. Fair Recruitment and Employment

All work must be freely undertaken, with clear terms of employment or engagement communicated in a language individuals understand. The Group requires an employer-pays approach to recruitment: individuals must not bear recruitment fees or related costs associated with obtaining their employment or engagement. Individuals must not be subjected to debt bondage or coercion, or have identity documents retained to restrict their freedom. Unlawful deductions and the withholding of wages as a means of control are prohibited. Individuals must retain control of their earnings and be free to leave their employment or engagement, subject to lawful notice requirements.

### 2. Labour and Subcontracting Risk Assessment and Due Diligence

Risk-based due diligence for labour suppliers and subcontractors will follow the supplier approval, categorisation and review arrangements set out under "Supply Chains and Supply Chain Due Diligence" and "Supplier Vetting and Management." Assessments related to labour suppliers and subcontractors will consider recruitment practices, further subcontracting, supply-chain complexity and the likelihood and severity of harm to individuals.

Supplier categories and modern slavery risk ratings will be clearly defined. Material changes or credible concerns will trigger reassessment outside scheduled reviews, with enhanced checks and safe, confidential worker engagement where appropriate. Supplier location, accreditation, and right-to-work checks will not, in themselves, establish that exploitation is absent.


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The Group will assess applicable right-to-work obligations across direct employment, labour-supply, and subcontracting arrangements.

### 3. Raising Concerns and Protection from Detriment

How to raise concerns will be communicated to all employees, agency workers, subcontractor personnel, and supplier workers through the company induction process.

The Group will not tolerate dismissal, detrimental treatment, threats, or retaliation because an individual raises a concern they reasonably believe to be true or assists an investigation, whether or not the concern is substantiated. This commitment does not limit any statutory whistleblowing protection. Confidentiality will be protected so far as reasonably practicable, subject to safeguarding obligations and applicable law. Nothing in this policy restricts an individual's right to make a protected disclosure or report concerns to an appropriate external authority.

## Safeguarding and Remediation

Where safeguarding is required, the safeguarding policy will apply. The MSWG will support the Safeguarding Lead with coordinated prompt responses, prioritising affected individuals' safety, dignity and welfare and taking account of their wishes and informed consent, subject to safeguarding requirements and applicable law. Apparent agreement to working arrangements does not, in itself, establish that exploitation is absent. Where appropriate, the Group will seek specialist advice and facilitate referral through the relevant authorised organisations. Personnel must report concerns rather than confront suspected perpetrators or conduct unauthorised investigations.

## Accountability and Review

Directors and senior management are responsible for implementation and adequate resourcing. The MSWG will oversee corrective actions. Implementation gaps and improvement actions will be recorded in the Modern Slavery Compliance Plan. Both the policy statement and compliance plan will be reviewed at least annually.

## Policy Access, Related Policies and Review

A copy of this policy will be accessible to all employees electronically and can be obtained from the IMS or viewed on the Lanes Group website.

This policy should be read in conjunction with the following:

- Anti-Bribery Policy
- Corporate Code of Conduct


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- Sustainable Procurement Policy
- Whistleblowing Policy
- Recruitment and Selection Procedure
- Supply Chain Approval Procedure
- Disciplinary Procedure
- Safeguarding Policy

The policy and the actions taken during each reporting year will be reviewed at least annually. The annual results will be reported separately from the standing policy commitments.

## 2. Annual Results

The following tables record the performance information currently available for FY2025 against KPIs established for the reporting year.

| | |
|---|---|
| Measure_01 | UK Group procurement process to maintain an approved list of suppliers across Lanes Group, and to ensure that suppliers are regularly reviewed for compliance with relevant legal and other requirements. |
| KPI_01_01 | Percentage of approved suppliers onboarded (excluding Tier 5) that provide a modern slavery policy statement or issued with to adhere to Lanes Group policy where their turnover is below £36 million |
| Result | *FY2025* |
| | 64% |
| KPI_01_02 | % of planned supplier audits conducted including risks and ethics. |
| Result | *FY2025* |
| | 0%; the supplier audit plan is on hold to allow for revisions to be made to the Group Procurement Strategy in FY 2027. |

| | |
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| Measure_02 | Measure completion of employee modern slavery awareness training through leadership and management e-learning. |
| KPI_02_01 | Percentage of leadership and management employees who have completed the I'AM e-learning module. |
| Result | *FY2025* |
| | 45% |

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| Measure_03 | Track the number of investigations initiated in response to reports of modern slavery or human trafficking, ensuring that all reports are thoroughly investigated and appropriate actions are taken. |
| KPI_03_01 | Number of incidents of human rights issues within reporting period. |
| Result | *FY2025* |
| | Zero reports |


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| | |
|---|---|
| Measure_04 | Measure the number of open corrective actions taken following the identification of modern slavery incidents. |
| KPI_04_01 | Number of corrective actions open within reporting period. |
| Result | *FY2025* |
| | Zero open actions |

| | |
|---|---|
| Measure_05 | Feedback from employees, suppliers, and clients regarding the effectiveness of modern slavery policies and processes to identify areas for improvement and ensure that the policy is effective. |
| KPI_05_01 | Number of actions or opportunities for improvement raised from audits. |
| Result | *FY2025* |
| | 10 actions or opportunities for improvement reported from client audits. |

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| Measure_06 | Track the reduction in the number of high-risk suppliers over time. This will reduce the overall risk of modern slavery within the supply chain. |
| KPI_06_01 | Supply chain heat map assessment and change to risk level. |
| Result | *FY2025* |
| | Delayed pending the planned update to supply-chain segmentation. |

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|---|---|
| Measure_07 | Pre-employment screening system in place to support right-to-work compliance. |
| KPI_07_01 | System in place for verification checks |
| Result | *FY2025* |
| | Rightcheck verification in place for all new employees being onboarded from January 2026 in the UK. |

## 3. Policy Statement Approval

On behalf of the Lanes Group Board of Directors the policy statement is approved by:

Jo Gretton



Chief Executive Officer of Lanes Group Ltd
19th November 2026


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