

MODERN SLAVERY STATEMENT

A) ORGANISATION

This statement applies to all companies within and associated to Tripod Crest Group Ltd (referred to in this statement as 'The Group'). The information included in the statement refers to the financial year 2026-2027.

B) DEFINITIONS

The Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

C) COMMITMENT

The Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Group does not knowingly enter into business with any other organisation which knowingly supports or is found to involve itself in slavery, servitude forced labour, or human trafficking.

All labour provided to the Group is sourced ethically, and we strictly follow all UK employment legislation, including right-to-work checks, wage regulations, and statutory employment protections.

D) ORGANISATIONAL STRUCTURE

The Group specialises in highways construction, road surfacing, planing, machinery hire and the provision of skilled labour, operating 24/7 nationwide. The organisation is part of a wider group consisting of Tripod Crest Ltd (Surfacing Solutions), Tripod Crest Planing Ltd and F&T Goodwin.

The Group operates from a centralised head office, which serves as the primary location for corporate governance, administrative functions, finance, commercial management, workshop and strategic leadership. In addition to this central office, the organisation also maintains an office and workshop in Bason Bridge Somerset.

The organisation's activities are conducted exclusively within the United Kingdom, with no current overseas offices or operational sites.

The organisation is overseen by a **Board of Directors**, responsible for strategic leadership, governance, and long-term planning across all group entities. Senior management teams within each company report into the Board, ensuring alignment and a cohesive approach to service delivery across the group.

E) SUPPLY CHAIN STRUCTURE

The supply chain incorporates a diverse range of suppliers, partners and subcontracted service providers, each contributing specialist materials, equipment, and labour essential to the delivery of the organisation's services.

The Group supply chain is inherently multi-tiered, reflecting the scale, technical nature and geographic spread of highways operations. While The Group maintains direct contractual relationships with a broad

number of first-tier suppliers, many of these suppliers operate as intermediary traders or distributors. As a result, they maintain their own networks of lower-tier manufacturers, processors or logistics partners.

The Group conducts supplier assessment and due-diligence processes for first-tier suppliers and expects them to apply equivalent standards within their own downstream supply chains. Where intermediary suppliers are used, the organisation acknowledges that they may have further contractual relationships with lower-tier suppliers, adding complexity to traceability and risk management.

The Group therefore expects all suppliers, regardless of tier, to uphold standards relating to health and safety, quality, ethical conduct, and legal compliance, in alignment with the Group's procurement and governance frameworks.

F) ORGANISATIONAL POLICIES

The Group has implemented a suite of policies that articulate expected standards of conduct, outline the controls in place, and provide clear mechanisms for identifying and addressing potential risks. These policies collectively reinforce the Group's zero-tolerance approach to modern slavery.

The key policies include:

Anti-Slavery & Human Trafficking Policy

This core policy outlines the Group's commitment to upholding the principles of the Modern Slavery Act 2015. It defines what constitutes modern slavery, sets out the organisation's expectations for employees, suppliers and subcontractors, and establishes the procedures for reporting, investigating and responding to suspected incidents. The policy applies to all Group companies, employees, agency workers and business partners, ensuring a consistent approach across the organisation.

Supplier Code of Conduct

The Supplier Code of Conduct sets clear expectations for ethical behaviour and labour standards across the Group's supply chain. It requires suppliers to:

- adhere to all applicable labour, employment and human rights laws
- prohibit forced, bonded or child labour
- maintain transparent recruitment and employment practices
- ensure that any subcontractors or lower-tier suppliers they engage also meet these standards

This document is provided to suppliers during onboarding and forms part of the Group's procurement and due-diligence processes. It enables The Group to communicate the standards required throughout all tiers of the supply chain.

Whistleblowing Policy

The Whistleblowing Policy provides a safe and confidential mechanism for employees, contractors, and external partners to raise concerns about unethical or unlawful conduct, including suspected modern slavery or human trafficking. The policy ensures that:

- individuals can report concerns without fear of retaliation
- concerns are treated seriously and investigated appropriately
- outcomes are escalated to senior management where required

This policy is a critical component of the Group's safeguarding framework, allowing issues to be identified at an early stage and ensuring transparency throughout the organisation.

Recruitment & Right-to-Work Checks Policy

The Group's recruitment policy establishes clear and compliant procedures for the appointment of both direct employees and agency workers. This includes:



- verifying the identity of all workers
- conducting rigorous right-to-work checks in accordance with UK legislation
- ensuring that recruitment agencies used by the Group follow ethical processes
- prohibiting any recruitment fees or practices that may expose individuals to exploitation

By embedding these controls, The Group reduces the risk of forced or illegal labour entering its workforce or supply chain.

These documents form a fundamental part of the Group's compliance programme and demonstrate its commitment to eradicating modern slavery and human trafficking in all business activities.

G) ASSESSING AND MANAGING RISK

Key risk areas within the Group's operations include:

- Agency labour used during peak periods
- Lower-tier suppliers of construction materials
- International manufacturers of specialist plant and equipment
- Subcontracted service providers operating with their own labour supply chains

To mitigate these risks we:

- Limit reliance on uncontrolled subcontracting
- Work with reputable labour providers with clear ethical frameworks
- Require transparency on labour sourcing and recruitment practices
- Communicate clear expectations to suppliers regarding modern slavery prevention
- Investigate concerns promptly and take corrective action where necessary

H) DUE DILIGENCE IN RELATION TO MODERN SLAVERY

The Group undertakes due-diligence checks on all new suppliers and periodically reviews existing suppliers based on their risk profile. Our processes include:

- Assessing geographic, sector and service-specific risk
- Reviewing supplier policies, accreditations and labour standards
- Obtaining confirmation of compliance with the Modern Slavery Act 2015
- Requiring contractual commitments to ethical labour practices
- Evaluating recruitment processes of labour agencies
- Monitoring subcontracting levels and labour sourcing transparency

Suppliers identified as higher risk may be subject to enhanced checks or on-site audits.

I) TRAINING

The Group delivers training and guidance to ensure employees and managers understand:

- How to identify signs of modern slavery
- How to report concerns
- Supplier risks within the construction and highways sector
- Their responsibilities under the Modern Slavery Act 2015

Training is provided to employees involved in procurement, HR, site management and supply chain engagement.

J) MONITORING AND EVALUATION

To assess the effectiveness of our approach, the Group monitors:

- Number of suppliers assessed through due diligence
- Incidents reported through whistleblowing or other channels
- Number of employees trained
- Compliance rates among labour providers

K) Steps/Actions Taken this year

The Group has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the The Group has taken the following steps to ensure that modern slavery is not taking place:

- Further strengthen supplier pre-qualification and monitoring
Reviewed and updated the Supplier Code of Conduct
- Expanded modern slavery training to include more operational roles
- Increased engagement with labour providers regarding ethical recruitment
- Improved visibility into lower-tier supplier practices

L) MODERN SLAVERY COMPLIANCE OFFICER

The Group has a Modern Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to The Group obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval by the Board of Directors 11th May 2026



Signed.....

Tim Neal

Managing Director

Date: 11th May 2026

