

## **MODERN SLAVERY STATEMENT 2023**

This statement is made on behalf of each of Severfield plc, Severfield (UK) Limited, Severfield (Design & Build) Limited, Severfield (Products & Processing) Limited, Severfield (NI) Limited, Severfield Infrastructure Limited and Severfield Nuclear and Infrastructure Limited.

Integrity is one of our core company values and this means that we will conduct our business lawfully and ethically. In accordance with this commitment we will respect human rights in our business operations and business relationships.

Severfield will not support or deal with any business we know is involved in slavery or human trafficking.

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.

Our purchasing teams and individuals responsible for procurement and recruitment and policy compliance are given appropriate Modern Slavery and wider ethics training so that they remain vigilant to the risk of any activities in our supply chain that contravene people's human rights. In addition we are currently implementing additional training across the workforce to increase awareness and have identified a lead point of contact for any queries regarding modern slavery or human trafficking.

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 is predominantly UK based 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.

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 not taking place within the organisation and within its supply chains. The following policies exist within the business and link to the company stance on Modern Slavery Act • Disciplinary Policy • Grievance Policy • Anti Bribery Policy • Social Media Policy • Whistleblowing Policy • Ethics Policy. These policies are made available to all employees when they join the company. Any changes are communicated across the company and training provided if needed.

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.

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

Approved by the Board on 26<sup>th</sup> April 2023.

Signed   
Alan Dunsmore  
Chief Executive Officer  
Severfield plc