

Modern Slavery & Human Trafficking Policy

Introduction

Modern slavery is a serious crime that deprives some people of their liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developing countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At GRS Group we have a zero- tolerance approach to modern slavery and are fully committed to preventing slavery, human trafficking and child labour in our operations and supply chain. We have taken concrete steps to tackle modern slavery and child labour, as outlined in our statement. The statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business and to implement steps to prevent slavery and human trafficking during the financial year 2024/2025.

Our business and supply chains

GRS Group is an ISO 9001 certified business and Britain's nationwide supply-chain partner for sourcing, processing, handling and transportation of construction and waste materials.

Over 50 years we have developed a locally focused, service-driven business, expanding to more than 75 sites and operations nationwide. With a Group turnover of over £450 million, GRS has supplied to many of Britain's high-profile infrastructure projects. For three years running (2016, 2017 and 2018) GRS was among the highest climbers in the Sunday Times top 250 growth companies.

We operate nationwide within the UK and our business is divided into three divisions: GRS Trading (Aggregates and Waste), GRS Building Products and GRS Integrated Solutions.

We establish a relationship of trust and integrity with our suppliers which is built upon mutually beneficial principles. Our supplier selection and on-boarding procedure include due diligence enquiries about the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. The business is committed to acting ethically and with integrity in all our business relationships.

GRS Group has not been made aware of any allegations of human trafficking/ slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Supplier and Client Adherence

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and our contractors to comply with our values. We expect them to comply with all applicable laws and regulations and publish an annual anti-slavery and human trafficking statement, where they are legally required to do so. We expect our suppliers to hold their own suppliers to these same high standards and that their employees meet these requirements.

Modern Slavery & Human Trafficking Policy

Due Diligence and Risk assessment for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk-

- We manage and monitor our sites and offices to ensure optimum control of the work environment ensuring compliance with applicable laws, our values and processes.
- We ensure that all managers conduct checks on employed personnel to ensure that they meet the requirements.
- We ensure that Managers conduct checks on any contractors upon engagement to ensure they meet the requirements via our supplier/contractor approval process.
- Records are maintained for young workers who are employed including DOB's, Health records and Risk assessments.
- We build long standing relationships with UK suppliers and clients making clear our expectations of business behaviour.
- With regards to national supply chains, our relationship is with UK companies and we expect these companies to have suitable anti-slavery and human trafficking policies and processes.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Child Labour

GRS Group strictly prohibits the use of child labour in any part of our operations and supply chain. We are committed to ensuring that no person under the minimum legal working age is employed or exploited in our business or by our suppliers. We require all suppliers and contractors to adhere to international standards on child labour, including compliance with the International Labour Organization (ILO) conventions and UK labour laws.

Key actions include:

- Conducting rigorous age verification checks during the recruitment process.
- Requiring suppliers to provide evidence of their compliance with child labour laws.
- Terminating relationships with any suppliers found to be in breach of child labour regulations.
- Regular audits and monitoring to ensure ongoing compliance throughout our supply chain.

Policies

GRS Group operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Ethical Sourcing Policy
- Whistleblowing - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- Values - our values encourage employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.

Supplier due diligence

GRS Group conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

Modern Slavery & Human Trafficking Policy

- Assessing risks in the provision of particular services
- Approval processes
- Auditing the suppliers

Awareness

GRS Group has raised awareness of modern slavery issues and demonstrates our commitment in the fight against modern slavery.

Training

In 2024/2025 we will be raising the awareness of Modern Slavery and child labour by advertising our statement further and bringing our employees attention to this by ensuring this is included in our induction process and communicated to our current employees, stating the various forms of modern slavery in which people can be held and exploited.

We endeavour to make employees aware of the size of the problem and the risk to our organisation. How employees can identify the signs of slavery and human trafficking could include:

- Unrealistically low prices
- Physical and sexual violence
- Intimidation and threats
- Where employees are under paid
- Deceptive recruitment practices including, being asked to pay a bond in order to gain employment
- Surrendering crucial documentation such as visa and passport to employer
- Forbidding employees to have families
- Restriction on workers' movement
- Living with threat of expulsion
- Subjected to abusive working and living conditions
- Forced into working excessive overtime

We will also raise awareness to employees so they know how they should respond if they suspect slavery or human trafficking.

Measuring how we're performing

GRS Group has defined a set of key performance indicators and controls to measure our effectiveness at combatting modern slavery and human trafficking in our organisation and supply chain. These include:

- 100% compliance of Right to Work
- Raise awareness to employees on our ethics policy and include in our new employee induction programme.
- Recording how many reports have been made by our employees that indicate their awareness of sensitivity to these issues.

This statement covers 10 June 2024 to 28 February 2025 and was approved by the board of GRS Group in June 2024.



Modern Slavery & Human Trafficking Policy

Jon Fisher – GRS Group CEO

April 2025