Modern Slavery and Human Trafficking policy statement

This statement is made in accordance with the Modern Slavery Act 2015 and constitutes Keltbray's modern slavery and human trafficking statement.

Keltbray has implemented policies and procedures to ensure fair and ethical treatment, these include:

- Equal opportunities and anti-discrimination
- Training and development
- Health, safety and wellbeing
- Fair pay
- Whistleblowing

Keltbray undertakes its works through a combination of directly employed people and engaging the supply chain through full subcontract or temporary employment of people through recruitment agencies.

Supply Chain

Keltbray's external supply chain is predominantly made up of organisations utilised across our Built Environment and Infrastructure divisions. It directly contracts these organisations to complete work on its behalf or for supply of materials, labour or other services.

- Keltbray's due diligence process for suppliers incorporates a review of the controls undertaken by the supplier. All organisations that the company deals with are required to confirm that both they and their supply chain are not knowingly involved in slavery and human trafficking. Such a declaration is required by all companies in order to be added to the company's preferred supplier list and forms part of the Group's 'Supply Chain Onboarding Management Process' (KEL-PRC-PRO-002)

Risk

Where Keltbray has most control, in respect of modern slavery and human trafficking, is in recruitment of direct employees. We have procedures in place to ensure that recruitment is completed in line with regulatory requirements and our people have access to rights and appropriate conditions. We view this area as low risk.

The highest risk to Keltbray is through our temporary staff who are recruited via recruitment agencies. Our recruitment process conforms to regulatory requirements and the fair and ethical treatment of temporary employees.

The policy is to periodically audit our roster of recruitment agencies across a range of topics as part of a continuous improvement process.

Keltbray's policy includes a Pre-qualification Questionnaire and on-boarding process for agencies that require the suppliers to produce documentation to confirm that they are compliant with requirements for modern slavery and payment of wages. As further risk mitigation and assurance, this information is reviewed externally by our insurers who confirm that all the necessary standards are met for supply as a pre-requisite to contract engagement.

Training

Training modules for modern slavery, corporate social responsibility, fairness and inclusion, and the 'right to work' are made available for voluntary completion as part of the Keltbray Learning and Development package.

Keltbray and its management team fully support this policy and are committed to provide competent personnel and financial resources to implement it.



Peter Burnside
Chief Executive Officer

Last review date: June 2026
Next review date: June 2027