

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

Kilnbridge is the UK's leading structures specialist and operates across a range of sectors and services throughout the UK.

This statement sets out the approach Kilnbridge Group Ltd and its subsidiary companies (Kilnbridge Construction Services Limited, Kilnbridge Structures Limited, Kilnbridge Structural Services Limited, Kilnbridge Fire Protection Limited, Kilnbridge Environmental Services Ltd, Kilnbridge Design & Engineering Limited, K-Plant Limited) have taken to date and the actions we intend to take throughout our financial year for 2026-2027.

Scope

This statement applies to all persons who act on our behalf in any capacity, including employees at all levels, directors, consultants, contractors, agency workers and those in our supply chain.

Our Commitment

Kilnbridge is committed to acquiring goods, services and labour without causing harm, exploitation or duress to others.

During 2025/26, Kilnbridge undertook a comprehensive review of its labour supply chain and contingent workforce arrangements. This resulted in the development of a new Labour Supply Chain and Workforce Engagement Governance Framework designed to strengthen labour supply chain transparency, worker welfare, workforce visibility and modern slavery controls across the Group. The framework introduces formal labour route assessments, supplier due diligence requirements, worker verification processes, labour supply chain mapping, worker welfare reviews and ongoing assurance activities to support ethical labour practices and identify potential exploitation risks.

Kilnbridge makes all reasonable endeavours to ensure our employees, affiliates and agents within our supply chain are not subject to any form of forced, compulsory/bonded labour or human trafficking and that they are paid at or above the national minimum wage or a fair market rate for self-employed workers.

We acknowledge our responsibility under the Modern Slavery Act 2015 ("the Act") and work to ensure that our operations and our ways of doing business align with the objectives and spirit of the Act.

The CEO and Board of Directors have full responsibility for ensuring that all members of staff understand their personal responsibility in preventing slavery, human trafficking and exploitation in our organisation and for ensuring that the Policies listed at the end of this statement are enforced.

Modern Slavery Risk Assessment

We acknowledge that opportunities for slavery and human trafficking could arise anywhere within our operations

but we have identified our primary areas of risk as being:

1. within our supply chain, which is predominantly UK and EU-based but may themselves purchase goods and services from other parts of the world, and
2. in our workforce (whether directly engaged or sub-contracted), particularly those doing peripatetic, short-term, blue-collar roles.

Our Risk Assessment Approach

During the year, Kilnbridge reviewed its labour supply chain and workforce engagement arrangements to understand modern slavery and labour exploitation risks better. The review considered labour engagement routes, labour supply chain transparency, worker welfare controls, lower-tier labour arrangements and workforce visibility across projects.

As a result, Kilnbridge identified higher risk areas including:

- contingent labour arrangements;
- labour supplied through intermediaries;
- lower-tier labour supply chains;
- short-term site-based labour engagements; and
- situations where worker visibility or payment transparency may be reduced.

These findings informed the development of a new Labour Supply Chain and Workforce Engagement Governance Framework, which introduces formal supplier due diligence, labour supply chain mapping, worker verification, ethical labour reviews and escalation processes to strengthen controls across the business.

Addressing Modern Slavery in Kilnbridge

We have a multi-faceted approach to addressing and ameliorating the risks of modern slavery in our business.

Labour Supply Chain Governance

During the year, Kilnbridge developed and began implementing a new Labour Supply Chain and Workforce Engagement Governance Framework. The framework strengthens our ability to understand who supplies, employs, engages, pays and supervises workers operating on our projects.

Key controls introduced include:

- formal labour route approval processes;
- labour supply chain mapping where intermediary arrangements exist;
- enhanced supplier due diligence and annual compliance declarations;
- worker identity, right to work and competence verification;
- prohibition of worker-paid fees;
- worker voice and grievance mechanisms;
- modern slavery site reviews and worker welfare assessments;
- escalation procedures for labour exploitation concerns; and
- ongoing assurance and sample testing of labour providers.

Several activities have been completed this year, including:

- Modern slavery remains on Kilnbridge's corporate risk register and is reviewed monthly by the

relevant management committee and quarterly by the Board. During the reporting period, the Company discussed modern slavery, Corporate Criminal Offence (CCO) compliance, and contingent labour risks as part of its governance activities, with updates on labour supply chain risks and workforce compliance initiatives. Following these reviews, Kilnbridge committed to working towards full Workforce Assured accreditation to strengthen further labour supply chain governance, worker welfare, workforce transparency and modern slavery risk management;

- During the reporting period, 72 employees completed Supply Chain Sustainability School learning modules, 28 employees attended specialist workshops, and modern slavery awareness formed part of monthly induction sessions attended by 116 workers and employees.
- Together, these activities help strengthen awareness of modern slavery risks and the reporting mechanisms available to employees;
- Marking Anti-Slavery Week in October, which included using our internal intranet platform, external social media platforms, and multi-language posters on site to communicate key messages, build our workforce's understanding of modern slavery, help them spot the signs, and raise awareness of what to do if they have concerns. We have plans to refresh all our internal activities quarterly;
- Running quarterly Toolbox Talks across our sites to raise awareness of this issue;
- We undertake ongoing verification of worker information, including bank account details, VAT registration information and home address records, to ensure information remains accurate and consistent with the details provided during onboarding. We complete checks for new assignments and as part of periodic review activities. These reviews help identify anomalies, maintain accurate worker records and support our wider modern slavery and workforce compliance controls. No significant concerns were identified during the reporting period;
- Conducting a full review of how we secure, use and monitor temporary labour on site by:
 - implementing a smaller, controlled preferred supplier list (PSL) who are vetted annually; Procurement completed 18 labour and modern slavery reviews across labour suppliers and subcontractors during the reporting period. All suppliers were approved, with no significant concerns identified. Ongoing reviews and monitoring activities will continue throughout the next reporting period;
 - requiring the PSL to sign up to our **Supply Code of Conduct** whereby they commit to paying their operatives/management staff at least the national minimum wage and provide assurances that they have freedom of employment;
 - introducing strict controls as to who can engage with the PSL and authorise temporary agency labour on site. We have strengthened controls around the engagement of temporary labour, ensuring labour providers are subject to formal due diligence, contractual compliance requirements, worker welfare obligations and ongoing assurance activities designed to support compliance with employment business legislation, workforce governance requirements and ethical labour standards;
 - all agency labour is monitored to ensure compliance with the Agency Worker Regulations 2010 and spot checks are undertaken on payslips to ensure that the rates agreed for operatives are being paid by the agency;

In addition:

- We continue to support the objectives of the former GLAA Construction Protocol and engage with industry initiatives and regulatory developments relating to labour exploitation, worker welfare and fair work practices. We work alongside organisations such as the Supply Chain Sustainability School, SEDEX and Workforce Assured to strengthen our approach to preventing modern slavery and labour exploitation. Through SEDEX, Kilnbridge reviews supplier ethical and labour standards performance as part of its supplier due diligence activities. During the reporting period, the Company reviewed its Top 25 suppliers by spend, and identified no significant modern slavery,

labour standards, or ethical trading concerns. Ongoing monitoring activities will continue throughout the next reporting period.

The following Policies support Kilnbridge's obligations under the Act and are available for all to view on our Konnect intranet portal:

- POL 018 KGL Responsible Procurement Policy
- POL 019 KGL Anti-Slavery & Human Trafficking Policy
- POL 007 KGL Equality, Diversity and Inclusion Policy

We communicate relevant policies and standards to suppliers through onboarding, pre-qualification activities, ITTs, contractual documentation, supplier due diligence, annual declarations, and ongoing supplier engagement processes. All suppliers must acknowledge and comply with Kilnbridge's **Supplier Code of Conduct** as part of our commercial engagement process. The Code sets the minimum ethical, legal, human rights, and labour standards expected of suppliers and their supply chains, including requirements relating to freely chosen employment, worker welfare, modern slavery prevention, right-to-work checks, and ethical business practices. Compliance with the Code forms part of Kilnbridge's supplier governance and assurance arrangements and is monitored through proportionate assessments, reviews and audit activities.

Worker Welfare and Worker Voice

Kilnbridge recognises that workers themselves are often best placed to identify concerns relating to exploitation, unfair treatment or unethical labour practices. Through our labour governance framework, workers have access to grievance procedures, whistleblowing arrangements, and worker welfare reporting channels. These arrangements are designed to ensure concerns can be raised confidentially and investigated appropriately. We also undertake worker welfare reviews and, where appropriate, worker interviews to assess working conditions and identify potential indicators of exploitation.

Plans for Ongoing Improvements

2026/27 Priorities

During 2025/26, Kilnbridge strengthened its understanding of labour supply chain risks and implemented a new Labour Supply Chain & Workforce Engagement Governance Framework. During 2026/27, we will focus on embedding these controls, increasing assurance activity, and achieving full Workforce Assured accreditation.

Priority 1 - Continue implementation of the Labour Supply Chain and Workforce Engagement Governance Framework across all Group businesses.

Priority 2 - Complete workforce compliance assurance reviews and support achievement of Workforce Assured accreditation.

Priority 3 - Expand labour supply chain visibility through supplier due diligence, annual declarations and labour supply chain mapping activities.

Priority 4 - Increase worker welfare reviews, modern slavery awareness activities and worker engagement initiatives across projects.

Priority 5 - Strengthen governance reporting through periodic assurance reviews, corrective action tracking and executive management reporting.

Priority 6 - Continue to develop supplier capability through collaboration with labour providers, subcontractors and industry partners to promote ethical labour practices and modern slavery awareness.

We will:

- continue to collaborate with smaller sub-contractors in our supply chain to share resources such as Supply Chain Sustainability School to promote awareness and compliance with the Act;
- promote our Whistleblowing hotline (CIRAS), so that anyone with genuine concerns around modern slavery (or other wrongdoing) can raise them confidentially, knowing their concerns will be acted upon; and
- undertake an audit, in line with the UK Government's Modern Slavery Assessment Tool, in instances where we identify a heightened risk of slavery in our supply chain.

About this policy statement

Where concerns relating to modern slavery, human trafficking or labour exploitation are identified, Kilnbridge will investigate promptly, implement corrective actions and work with relevant stakeholders to protect affected individuals. Where appropriate, we may provide support and guidance through recognised organisations and reporting bodies, including the Modern Slavery & Exploitation Helpline operated by Unseen.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Modern Slavery and Human Trafficking statement for the financial year ending 30th June 2027.



Owen Dannatt
Chief Executive Officer