

MODERN DAY SLAVERY & HUMAN TRAFFICKING STATEMENT, STONBURY GROUP. FINANCIAL YEAR JULY 25 to JUNE 26

Owner Head of Supply Chain

Date 23-12-25

Stonbury remains committed to protecting and respecting human rights and has a zero-tolerance approach to slavery in all its forms. We recognise that modern slavery is a significant global human rights issue. We will act ethically and with integrity in all our relationships and use all reasonable endeavours to influence others to ensure slavery and human trafficking is not taking place in areas linked to our business. This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken and will take in relation to slavery and human trafficking.

This Statement is published on the company's website (stonbury.com/policy-documents) and is reviewed annually.

OUR BUSINESS

Stonbury group and subsidiaries are agile, direct delivery specialist contractors serving both the water industry and the wider water environment, with an emphasis on delivering innovative, low-carbon and high-quality reliable solutions. We work with UK's water companies and the Environment Agency - either directly or through their major supply chains - to deliver high-value, low-carbon solutions across their asset estates. This includes works on potable water, wastewater treatment centres and nature-based 'green' and 'grey' solutions that deliver smart, low carbon environmental engineering.

POLICIES AND MEETING THE REQUIREMENTS OF THE MODERN SLAVERY ACT, 2015

Stonbury's policy on Modern Day Slavery & Human Trafficking has been updated to reflect our responsibilities under the Modern Slavery Act, 2015 and our commitment to acting ethically and with integrity in all our business relationships.

- The Board of Directors has overall responsibility for demonstrating, through clear and visible leadership, that human rights are integral to the way we do business.
- The Directors are also responsible for monitoring compliance with the policy in all aspects of our business.
- Managers and supervisors provide visible leadership that promotes human rights as an equal priority to other business matters.
- We also believe that all our employees are responsible for helping to ensure that we operate free from human trafficking, human rights abuses, slavery and forced labour.
- We will report any instances where we identify common signs of forced labour.
- We are taking a risk-based approach to maximise effectiveness whilst being cognisant of our operational reach and scope.

We have a number of policies and values which together address our commitment to mitigate the risk of modern slavery and human trafficking taking place within our businesses and in our supply chain, as well as ensuring we act ethically and with integrity in all our business relationships.

This includes our policies and values on:

- Anti-bribery & Corruption
- Whistleblowing
- Equality, Diversity and Inclusion - including Fixed-term Employees and Agency Workers
- Recruitment and Selection
- Employee Handbook
- Sustainability Commitment



ORGANISATIONAL STRUCTURE & SUPPLY CHAIN

We recognise that our responsibility for human rights, labour conditions and anti-slavery encompasses:

- Employees — Our staff of approximately 375 are based across the UK, whilst we operate out of depots our work is typically carried out at client sites, and we do not normally undertake work overseas. We are a fair employer, members of the Living Wage Foundation and ensure that our company values and policies are communicated to all employees.
- Our Supply Chain primarily consists of construction materials, subcontractors (both labour and specialist skills), ancillaries such as PPE / work wear, and plant/equipment hire
- It is our aspiration that the working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions. We procure the majority of our directly sourced materials from UK based organisations that are required to comply with UK laws on forced labour. Review and assessment processes are carried out across our supply chain to ensure their commitment to the requirements of the Modern Slavery Act
- Subcontractors – the government has recognised the construction sector as being a high-risk industry for modern slavery and associated issues. As such, our approach is to ensure we have clear knowledge of whom we are doing business and that they have the appropriate policies in place.
- Our Customers – we are an ethical business and continue to meet the high standards of our customers by achieving the required assessment criteria and meeting the demands of independent, external audits. We also comply with customers' Codes of Conduct and policy requirements.

DUE DILIGENCE PROCESSES

As part of our initiative to identify and mitigate risk we have taken steps to remove modern slavery from our supply-chain. We therefore acknowledge our duty to continually review and monitor our supply chain and subcontractors, labour-agencies and any other related third parties.

Regular reviews take place to:

- Monitor, review and update our approved supplier/subcontractor vetting process.
- Ensure that suppliers have policies and procedures in place to vet and monitor their supply chain, especially where this is not located in the UK
- Develop long-term relationships within our supply chain, especially companies/individuals who hold similar values to ourselves.
- We will continue to monitor the supply chain to assess the risk of slavery and human trafficking being present and develop measures to further mitigate against any such risk.
- Our recruitment processes are reviewed regularly. We have procedures in place for the vetting of new employees and undertake references and checks to confirm their identities. Employees are paid directly into an appropriate, personal bank account. We have policies and procedures in place to ensure compliance with UK employment and human rights laws, and all staff are remunerated fairly and above the UK's national living wage. We encourage employees to report in good faith any issues or concerns they may have regarding unethical business practices.

TRAINING ON MODERN SLAVERY

A key weapon in the fight against modern slavery are the eyes and ears of Stonbury's employees as they interact with other organisations. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and our supply chains, we have an ongoing training programme in place to ensure our permanent employees are trained in our respective policies and procedures alongside training on the wider topic from an external provider to ensure the content is up-to-date and accurate. The aim is that employees are not only aware of the topic but are also familiar with the warning signs and know what action to take.

UPDATE FOR 2025-2026

Although another year has passed with no reports of concern within Stonbury's operational reach, we are very much aware that the risk has not decreased, and if anything it has increased, and as such the company's commitment is unchanged.

Supply Chain & Sub-contractors

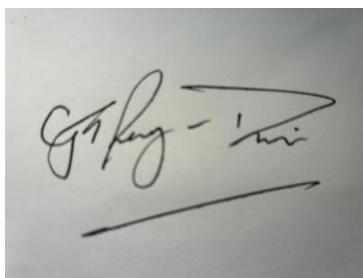
As the company continues to enjoy business growth, the supply chain required to support is also growing in terms of both capacity and capability. We still procure the majority of our directly sourced materials from UK based organisations that are required to comply with UK laws on forced labour and we assess the risk of new suppliers during the onboarding process.

The processes were originally developed for Stonbury Ltd and will be harmonised with those of Panton McLeod Ltd.

Awareness Training

The coverage of awareness training is being extended to cover the whole organisation, this training is via an online platform so it is readily accessible even for remote teams and the frequency has been increased to annually. 93% of the business has completed the training with 25% having completed in the last 12 months, the target is for 90% of the business to be no more than 12 months from the last training session.

For new starters the modern slavery training is part of induction and a requirement to complete probation.



Approval

Signed by the CEO

Colin Perry-Davis

Date 23rd December 2025