

Vision

The purpose of this policy is to guide EKFB in its compliance with the Modern Slavery Act 2015, providing measures to tackle slavery and human trafficking within our business and supply chains. EKFB has a strict 'zero tolerance' approach towards modern slavery or human trafficking in any part of our business or supply chain.

This vision aligns with our principles of **Shaping infrastructure for a better tomorrow** and **Following the Rules**.

Scope

The risks associated with modern slavery and human trafficking are applicable across all our operations, including direct employment, subcontracted employees, and/or provision of goods and materials. This policy applies to everyone working under the EKFB joint venture, regardless of their role or the nature of their employment, including but not limited to contractors, suppliers, consultants, temporary workers, job applicants, and individuals working for EKFB via a third party.

What is Modern Slavery?

Modern Slavery is where individuals are exploited and deprived of their freedom for personal and commercial gain. Modern Slavery covers various forms of exploitation:

- Human trafficking – the use of violence, threats, or coercion to transport, recruit, or harbor people for exploitation, such as forced labour, criminality, marriage, or organ removal
- Forced labour – any work or services people are forced to do against their will
- Debt bondage – when individuals are forced to work to repay a debt, losing control over both their employment conditions and the debt
- Child labour – the exploitation of children through any form of work that deprives them of their childhood, education, or is harmful to their health

Spotting the signs of Modern Slavery

You should be aware that certain situations, often referred to as “red flags”, might indicate that someone might be a victim of slavery:

- Individuals appear to be under the control of someone else. For example, they may not have access to personal identification documents, few personal possessions, and may wear the same clothes every day
- Individuals demonstrate poor living conditions, such as working and living at the same address, or residing in dirty, cramped, and overcrowded accommodation
- Individuals exhibit signs of isolation, including limited interaction with others, and unfamiliarity with their neighbourhood or workplace
- Individuals may appear reluctant to seek help, demonstrated by behaviours such as avoiding eye contact, expressing fear of deportation, and uncertainty about whom to trust or where to get help

Principles

We are committed to acting ethically and with integrity, maintaining systems and controls designed to prevent modern slavery in our business and across our supply chain. We expect that no workers in our operations, joint ventures, and supply chains should be subject to abusive or inhumane practices. EKFB ensures compliance with this policy through the following commitments:

- EKFB's Confidential Whistleblowing Safecall Reporting Line provides a mechanism for our employees and others working in our supply chain to report suspected breaches. Reports can be made anonymously, and individuals will not face any detriment for raising such concerns.
- Subcontractors and suppliers must acknowledge their responsibility to adhere to our policies relating to modern slavery and human trafficking. They are required to submit their respective policies and statements during the bid and tender process. Their continued adherence to these policies will be regularly audited.
- We undertake periodic risk assessments to identify key risks in our business and supply chain and implement additional monitoring measures, which include KPIs and supplier audits.
- Should we identify issues, including those found through our audit process, that are not satisfactorily resolved, we review our relationship with the relevant organisation.
- All labour providers must have a Gangmasters and Labour Abuse Authority (GLAA) licence to work with EKFB.
- We undertake checks on new recruits to ensure that they are eligible to work in the relevant country of employment.
- We aim to directly employ our workforce, and we encourage our supply chain to do the same, particularly focusing on avoiding the use of zero-hour contracts.
- We do not require our workers to work unreasonable hours, exceed legal limits, or without appropriate breaks and defined periods of leave.

These principles align with the modern slavery annual statements from our parent companies that form the Joint Venture, as per section 54(1) of the UK Modern Slavery Act 2015. Furthermore, this policy is supported by HS2 Employee and Industrial Relations Code of Practice, EKFB Employee Relations standard and EKFB Equality, Diversity, and Inclusion Policy Statement.



Demonstrating our commitment

At EKFB, we are committed to proactively increasing awareness of the signs of modern slavery by delivering training at our sites and offices and reinforcing the availability of the EKFB Confidential Whistleblowing Safecall Reporting Line for reporting suspected breaches. EKFB will thoroughly investigate all reports and take appropriate actions.

Failure to comply with this policy will be treated as serious disciplinary offence, and may result in reprimand, suspension, and/or summary dismissal for gross misconduct under the disciplinary procedures of the parent company. We reserve the right to terminate our relationship with any individuals or organisations working on our behalf should they fail to comply with this policy.

Policy Review

This policy has immediate effect and replaces all previous versions. The next review date is 01 February 2026.

Board approved and signed on behalf of the Executive Directors for the project:



Sally Cox, EKFB Managing Director

Date 1st February 2025

