

## Vision

The purpose of this policy is to guide EKFB in complying with the Modern Slavery Act 2015 by implementing effective measures to prevent and address slavery and human trafficking within our business and supply chains. EKFB adopts a strict 'zero tolerance' approach to modern slavery and human trafficking in any part of our business or supply chain.

This vision is supported by **Shaping infrastructure for a better tomorrow** and **Following the Rules** principles.

## Scope

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

## What is Modern Slavery?

Modern Slavery occurs when individuals are exploited and deprived of their freedom for personal and commercial gain. It encompasses various forms of exploitation, including:

- Human trafficking - the use of violence, threats, or coercion to transport, recruit, or harbour people for exploitation, such as forced labour, criminality, marriage, or organ removal.
- Forced labour - any work or services people are compelled to perform against their will.
- Debt bondage - a situation where individuals are forced to work to repay a debt, losing control over both their employment conditions and the debt itself.
- Child labour - the exploitation of children through work that deprives them of their childhood, education, or harms their health and well-being.

## Spotting the Signs of Modern Slavery

You should be aware that certain situations, often referred to as "red flags", may indicate that someone could be a victim of modern slavery:

- Individuals appear to be under the control of someone else. For example, they may not have access to personal identification documents, have few personal possessions, and may wear the same clothes every day or not dress appropriately for the weather.
- Individuals demonstrate poor living conditions. This may include working and living at the same address or residing in unhygienic, cramped, and overcrowded accommodation.
- Individuals exhibit signs of isolation. They may have limited interaction with others and show unfamiliarity with their neighbourhood or workplace.
- Individuals may arrive at work very early or leave very late, suggesting they are being dropped off and picked up at unusual hours.
- Individuals may avoid eye contact, express fear of deportation, or show uncertainty about whom to trust or where to seek help.

You can use the Safecall Whistleblowing reporting line if you suspect or are concerned someone may be a victim of modern slavery or if you have observed any "red flag" behaviour. All reports will be taken seriously and investigated fully. Reports can be submitted anonymously, and individuals will not face any detriment for raising their concerns.

If it is an emergency and someone you know is in imminent danger, call 999 and ask for the Police. For non-emergencies, you can contact the UK Modern Slavery & Exploitation Helpline at 08000 121 700. This helpline is operated by the independent charity Unseen UK.

## Principles

We are committed to acting ethically and with integrity, maintaining systems and controls designed to prevent modern slavery within our business and across our supply chain. We firmly believe that no workers in our operations, joint ventures, and supply chains should be subjected 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 conduct Right to Work checks on all new operatives joining the project to ensure their eligibility to work in the country
- 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 work without appropriate breaks and defined periods of leave.

These principles align with the modern slavery annual statements issued by our parent companies that form the Joint Venture, in accordance with 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.



## Consequences of Breaching this Policy

Failure to comply with this policy will be treated as a 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.

## Demonstrating Our Commitment

At EKFB, we are committed to proactively increasing awareness of the signs of modern slavery by delivering training at our sites, offices, and through our eLearning platform. We also emphasise the availability of the EKFB Confidential Whistleblowing Safecall Reporting Line for reporting any suspected breaches. All reports will be thoroughly investigated, and appropriate actions will be taken.

## Policy Review

This policy has immediate effect and will be reviewed annually and updated as necessary to ensure it remains effective and relevant. The next review date of this policy will be 01 February 2027.

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

A handwritten signature in black ink, appearing to read 'Sally Cox'.

**Sally Cox, EKFB Managing Director**

**Date: 02 February 2026**

