

This Policy Statement applies to all Spencer Group Employees, Contractors and others who engage with Spencer Group. The Policy is in accordance with the Modern Slavery Act 2015 and relates to all of Spencer Group's work activities and supply chain partners.

It sets out the steps Spencer Group will take to ensure that slavery and human trafficking is not taking place in any of its dealings.

Spencer Group's Policy in relation to slavery and human trafficking

Spencer Group does not permit, condone or otherwise accept any form of slavery and/or human trafficking (as defined in the Modern Slavery Act) either by its employees, subcontractors, contractors, agents, partners or any other organisation, entity, body, business or individual with whom Spencer Group engages or does business with.

Spencer Group is committed to preventing any form of slavery and/or human trafficking in its activities and to ensure that its Associated Parties are free from any form of slavery and/or human trafficking.

In the event that Spencer Group suspects any slavery and human trafficking by an Associated Party, we reserve the right to report such suspicions, provide appropriate information to the relevant authorities, and to suspend or terminate any associated engagement, business arrangement or contract.

All Spencer Group Subcontractors, Suppliers and other Associated Parties are required to provide details of the actions they are taking to ensure labour exploitation, slavery and human trafficking are not taking place in their operations or supply chain and permit Spencer Group to audit its compliance to this Policy, including making records available to Spencer Group to demonstrate compliance.

Spencer Group's due diligence processes in relation to slavery and human trafficking in its business and supply chains

In order to ensure that no slavery or human trafficking is taking place within its supply chain, Spencer Group shall:

- Incorporate the Policy into Spencer Group's Pre-Subcontract Appraisal for suppliers, subcontractors and partners.
- Publish the Policy on Spencer Groups website for public access.
- Incorporate the Policy into Spencer Groups on-line pre-approval questionnaire.
- Include an acceptance condition in Spencer Groups supplier Pre-Subcontract Appraisal document that suppliers must abide to the Policy.

Spencer Group's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate

The effectiveness of ensuring that slavery and human trafficking is not taking place in Spencer Group's business or supply chains shall be assessed by application of the following key performance indicators:

- To raise awareness of slavery and human trafficking by bringing the contents of the Statement and Policy to the attention of all employees by publishing it on the portal.
- Requirement to staff who induct new employees to introduce employees to the Policy.
- Incorporate supplier adherence to the Policy within Spencer Group's supplier appointment process.

The parts of Spencer Group's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps we have taken to assess and manage that risk

- Suppliers and subcontractors: there may be a risk of slavery and/or human trafficking through organisations with whom Spencer Group contracts for the supply of products or services, or through organisations with whom Spencer Group subcontracts work to or partners with.
- The appointment of suppliers and subcontractors is subject to careful due diligence to ensure that there is no perceivable risk of slavery and/or human trafficking. Spencer Group engages only with reputable suppliers or parties that do not engage in any form of slavery and/or human trafficking.
- All such parties are also expected to adhere to Spencer Group's policy, which is incorporated into the process for being appointed as such and/or the relevant contractual relationship.
- Spencer Group avoids contracting with suppliers or subcontractors which are located within geographical

areas where slavery and/or human trafficking are a risk. In the event that the business contracts with suppliers or subcontractors outside of the United Kingdom, it shall assess the supplier/subcontractor and the relevant geographic area on a case by case basis, undertaking any necessary due diligence in accordance with the paragraph below.

- The Spencer Group Safety, Health, Environment and Quality (SHEQ) Team shall be responsible for any compliance matters set out in this Statement and Policy, for ensuring due diligence and for undertaking audits. Spencer Group HR Team is responsible for ownership of this Statement and Policy.
- The Head of Human Resources has undertaken **Stronger2gether** training to support this policy.
- The Systems Director assumes responsibility for implementation of the policy across the business.

Spencer Group training about slavery and human trafficking available to its employees

- Visibility of the Policy on the staff portal.
- Communication to employees to read the Statement and Policy and confirm understanding.
- Access for all employees to additional resources on the **Stronger2gether** web site.
- New employees to be introduced to slavery and human trafficking as part of their induction.



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Mr G Thornton, Managing Director

Date Signed: 01 April 2026

Next Review: 31 March 2027

Approved by the Executive Board of Directors

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The Slavery and Human Trafficking Policy Statement applies to the following Spencer Group businesses:-

- Spencer Engineering Group Ltd
- C Spencer (Holdings) Ltd
- Spencer Rail Engineering Ltd
- Spencer Bridge Engineering Ltd
- Spencer Building and Civil Engineering Ltd
- Construction Plant and Site Services Group Ltd
- Engineering and Design Services Group Ltd
- Layer8 IT Ltd
- any subsidiary companies.