

TRIPLEX INDUSTRIAL CONTRACTORS LTD

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Version: 2.0

Version Control

Version	Date	Author	Approved By	Summary of Changes
1.0	June 2025	Assistant Director	Board of Directors	Initial issue, from old policy.
1.1	January 2026	Assistant Director	Board of Directors	Minor amendments to legislative references and supplier due diligence requirements.
2.0	July 2026	Director	Board of Directors	Full policy review and restructuring. Expanded governance arrangements, recruitment controls, supply chain due diligence, reporting procedures, monitoring arrangements and continual improvement measures. Revised to align with the Modern Slavery Act 2015, Common Assessment Standard, Constructionline Gold and ISO Management System requirements.

Effective Date: July 2026

Review Date: July 2027

Policy Owner: Director - Kieran Dyer

Approved By: Board of Directors

1. Policy Statement

Triplex Industrial Contractors Ltd ("Triplex") is committed to conducting all aspects of its business ethically, responsibly and with the highest standards of integrity. The Company recognises that modern slavery, human trafficking, forced labour, servitude and all forms of labour exploitation are serious criminal offences and fundamental violations of human rights. Such practices are wholly incompatible with the Company's values and will not be tolerated under any circumstances.

As a specialist provider of Traffic Management, Civil Engineering and Infrastructure Support Services, Triplex understands that the construction and infrastructure sectors present particular risks due to the use of subcontractors, temporary labour, recruitment agencies and complex supply chains. Whilst the Company considers the risk of modern slavery occurring within its directly employed workforce to be low, it recognises that effective governance requires continual vigilance throughout every aspect of its operations and procurement activities.

Triplex is committed to maintaining robust management systems that identify, assess and mitigate the risk of modern slavery within both its own operations and its wider supply chain. This commitment extends beyond compliance with the Modern Slavery Act 2015 and reflects the Company's broader responsibility to protect the dignity, welfare and rights of every individual engaged in its business.

The principles contained within this Policy apply equally to all employees, directors, agency workers, consultants, labour providers, subcontractors, suppliers and any organisation acting on behalf of Triplex. Every individual engaged by the Company shares responsibility for maintaining these standards and contributing towards the prevention of exploitation in all its forms. This builds upon Triplex's established zero-tolerance approach to modern slavery and its expectation that suppliers uphold equivalent standards.

2. Purpose, Scope and Legislative Framework

The purpose of this Policy is to establish the arrangements through which Triplex prevents, identifies and responds to the risk of modern slavery and human trafficking. It provides a clear framework for ethical recruitment, responsible procurement, supplier management and the reporting of concerns, ensuring that the Company conducts its activities in accordance with both legal obligations and recognised industry best practice.

This Policy applies to every person working for or on behalf of Triplex, regardless of their employment status. It includes permanent employees, temporary workers, apprentices, agency workers, consultants, subcontractors, suppliers, recruitment agencies, labour providers and any other organisation engaged in the delivery of goods or services to the Company.

Triplex has developed this Policy with reference to the requirements of the Modern Slavery Act 2015 and other relevant legislation including the Human Rights Act 1998, Employment Rights Act 1996, Equality Act 2010, Immigration, Asylum and Nationality Act 2006, National Minimum Wage Act 1998, Working Time Regulations 1998 and the Public Interest Disclosure Act 1998. The Company also recognises the ethical sourcing expectations placed upon organisations operating within the construction and infrastructure sectors and seeks to align its practices with recognised industry standards.

3. Governance and Responsibilities

The Board of Directors retains overall responsibility for ensuring that Triplex maintains effective governance arrangements to prevent modern slavery and human trafficking. This includes approving Company policy, allocating appropriate resources, reviewing organisational performance and promoting a culture in which ethical business practices are embedded throughout the organisation.

Senior Managers are responsible for ensuring that the principles contained within this Policy are integrated into operational activities, procurement decisions and supplier management processes. They are expected to promote compliance through effective leadership, ensure that appropriate due diligence is undertaken where necessary and support continual improvement of the Company's management systems.

Line Managers are responsible for ensuring that employees understand their responsibilities under this Policy, remain alert to the indicators of labour exploitation and report any concerns promptly through the appropriate management channels. Managers must ensure that workers are recruited

lawfully, treated fairly and provided with working conditions that meet all applicable legal and contractual requirements.



Employees are expected to familiarise themselves with this Policy, conduct themselves in accordance with its requirements and immediately report any actual or suspected instances of modern slavery or labour exploitation. Failure to comply with this Policy may result in disciplinary action.

4. Recruitment, Employment Practices and Supply Chain Due Diligence

Triplex is committed to ensuring that all recruitment activities are undertaken fairly, transparently and in accordance with applicable employment legislation. The Company operates procedures designed to verify the identity and legal entitlement of every individual employed or engaged on its behalf. Right to work documentation is verified prior to employment commencing, and all relevant employment records are maintained securely in accordance with Company procedures.

The Company expects every worker to retain possession and control of their own identity documents, bank accounts and personal information. No employee or representative of Triplex shall withhold passports, identity documentation or wages, nor impose any arrangement that could reasonably be interpreted as coercive or exploitative.

Where labour providers or recruitment agencies are utilised, Triplex will engage only organisations considered to be reputable and competent. Appropriate due diligence will be undertaken before workers are supplied to ensure that recruitment practices comply with legal requirements and that workers have not been subjected to unlawful recruitment fees or exploitative employment arrangements. These expectations are consistent with the Company's existing recruitment controls.

The Company recognises that effective supply chain management is fundamental to preventing modern slavery. Accordingly, suppliers and subcontractors are expected to operate to standards equivalent to those adopted by Triplex and to demonstrate compliance with all applicable employment, health and safety and human rights legislation. Suppliers are expected to undertake appropriate due diligence within their own supply chains and ensure that equivalent standards are communicated to any subcontractors or third-party organisations engaged by them.

Triplex reserves the right to request evidence demonstrating compliance with this Policy, undertake supplier assessments where appropriate and investigate any concerns relating to unethical employment practices. Where a supplier is found to have breached the principles contained within this Policy, the Company may require immediate corrective action, suspend ongoing works or terminate contractual arrangements where considered appropriate. This reflects the supplier compliance and audit expectations set out in Triplex's current policy.

5. Recognising, Reporting and Investigating Concerns

Modern slavery can present itself in many different forms and may not always be immediately apparent. Employees should remain vigilant for indicators that may suggest an individual is being exploited, including unusual behaviour, signs of intimidation, restricted freedom of movement, possession of identity documents by another individual, excessive working hours, unexplained deductions from wages, poor living conditions or an apparent reluctance to engage with colleagues or management.

Any employee who becomes aware of, or suspects, that modern slavery or human trafficking may be occurring within the Company's operations or supply chain has a duty to report their concerns

immediately. Reports should ordinarily be made to the individual's Line Manager; however, concerns may also be raised directly with Human Resources or through the Company's Whistleblowing Procedure where appropriate.

All reports will be treated seriously, handled confidentially and investigated proportionately. Triplex is committed to ensuring that no individual suffers any detriment, victimisation or adverse treatment as a consequence of raising a genuine concern in good faith. Where investigations identify evidence of criminal activity or significant safeguarding concerns, the Company will cooperate fully with the appropriate enforcement authorities, including the Police, the Gangmasters and Labour Abuse Authority and other relevant regulatory bodies. This reporting process aligns with the arrangements described within the existing policy.

6. Monitoring, Compliance and Continuous Improvement

Triplex is committed to continually improving its approach to preventing modern slavery and human trafficking. Compliance with this Policy will be monitored through internal audits, supplier reviews, procurement assessments, management inspections and periodic reviews of recruitment practices. Where appropriate, suppliers may be requested to provide evidence of their own policies, procedures and due diligence arrangements.

The Company will provide appropriate training and awareness to employees whose roles involve recruitment, procurement, operational management or supplier oversight. Training will be reviewed periodically to ensure that it reflects current legislation, recognised best practice and the evolving risk profile of the business.

Performance against this Policy will be reviewed by Senior Management on a regular basis, with any lessons learned incorporated into future improvements. This Policy will be formally reviewed at least annually, or sooner where changes in legislation, operational activities or identified risks make earlier review necessary.

7. Breaches of this Policy

Compliance with this Policy is a condition of employment and forms part of the contractual obligations placed upon suppliers, subcontractors and other organisations acting on behalf of Triplex.

Any employee found to have knowingly participated in, facilitated or failed to report activities that constitute modern slavery or human trafficking may be subject to disciplinary action, up to and including summary dismissal for gross misconduct.

Where a supplier, subcontractor or labour provider is found to have breached the requirements of this Policy, Triplex reserves the right to suspend or terminate contractual arrangements with immediate effect, remove the organisation from its Approved Supplier List and, where appropriate, notify the relevant statutory or regulatory authorities. These consequences are consistent with the Company's existing policy provisions.

Appendix A - Common Indicators of Modern Slavery

Whilst the presence of one indicator does not necessarily confirm that modern slavery is occurring, employees and managers should remain alert where individuals exhibit one or more of the following characteristics:

Potential Indicator	Examples
Identity Documentation	Worker does not possess their own passport or identification documents.
Freedom of Movement	Worker appears unable to leave employment or accommodation freely.
Behaviour	Individual appears fearful, withdrawn, intimidated or reluctant to speak independently.
Financial Control	Wages are paid into another person's bank account or controlled by a third party.
Living Conditions	Worker lives in overcrowded, unsafe or employer-controlled accommodation.
Excessive Working Hours	Individual consistently works unusually long hours with little or no rest.
Recruitment Practices	Worker is unable to explain their employment arrangements or believes they owe a debt to their recruiter.
Signs of Abuse	Evidence of neglect, physical injury, malnutrition or poor personal welfare.

Signed on behalf of Triplex Industrial Contractors Ltd

Signed: *K Dyer*

Name: Kieran Dyer

Position: Director

Date: 14/07/2026