

1.0 Introduction

Rainton Construction Limited's (RCL) annual Slavery and Human Trafficking Statement provides information to supplement our Modern Slavery and Trafficking policy. In this statement, we set out the steps we have taken during the calendar year to ensure that slavery and human trafficking are not taking place in our supply chains or any part of our business. We include details of our activities, supply chains and actions to ensure we do not deliberately or inadvertently support modern slavery. The content of our modern slavery statement will evolve, demonstrating a year-on-year improvement outlining practical progress in tackling the risks and incidence of modern slavery in our operations and supply chains. This statement relates to actions and activities from 1 April 2023 to 31 March 2024.

This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes the slavery and human trafficking statement for RCL.

2.0 Scope

Rainton Construction Limited:

The provision of bridge refurbishment, including reinforced concrete structures and associated infrastructure works, as well as road construction and resurfacing.

National Highways Sector Schemes for Quality Management in Highway Works Scheme 16 for Management of The Laying of Asphalt Mixes – Machine Lay and Hand Lay (With Normative Document BS 594987: 2010 Asphalt For Roads and Other Paved Areas – Specification For Transport, Laying, Compaction and Type Testing Protocols).

3.0 Policies and Responsibility

We have made several commitments in our policies to help us address the risk of slavery and human trafficking occurring in our operations or supply chains. The following policies are the ones that we consider give us strength in avoiding modern slavery or human trafficking under the Act:

- Modern Slavery and Human Trafficking
- Corporate Social Responsibility
- Equality and Diversity
- Anti-Bribery and Corruption
- Code of Conduct
- Procurement.

The Board of Directors determines company policies. Dave Elliott, Chief Executive, has been appointed responsible for this policy.

4.0 Supply Chain

We are committed to ensuring no modern slavery or human trafficking in the supply chain (including sub-contractors, consultants, materials suppliers, distributors, and labour agencies) or any part of the business. We will take a zero-tolerance approach to slavery and human trafficking.

5.0 Assurance Process

To identify and mitigate slavery and human trafficking risks, we undertake due diligence when considering taking on new supply chain partners and regularly review our existing list. Due diligence and reviews have included:

- For the procurement of supply chain partners (subcontractors (including labour only) and specialist consultants), MGL uses the Constructionline platform to help us manage risk within our supply chain. Therefore, all our subcontractors are encouraged to become verified with Constructionline so they can continue working with us. In addition, we are requesting that our supply chain achieve a minimum of Silver Accreditation.
- Our standard form contracts include an obligation to comply with our SHEQ Terms and Conditions, containing obligations relating to modern slavery.

6.0 Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the supply chain and within the Company, we provide training for those involved in procurement, estimating, health and safety and those responsible for supply chain management and people management.



The following training has been provided within our business to staff this year:

- iHasco Modern Slavery - e-learning module delivered to varying teams, including Directors, SHEQ, Commercial and Business Development.

7.0 Future Development

- Monitor Constructionline to ensure the continued compliance of those subscribed and request updates where information is not verified.
- Issue invitations via Constructionline requesting non-members to subscribe and those at a level less than silver to upgrade their membership.
- Widen the scope of the MGL Group on-boarding process to
- Conduct compliance audits with key supply chain partners, including modern slavery arrangements.
- Further roll-out of the iHasco Modern Slavery e-learning module to specific functional teams to increase awareness among our employees and ensure they can identify the signs of modern slavery and understand how to report it. Support the rollout with TBT sessions.

Revision and Approval

| | Authors | Approver |
|-------------------|---|---|
| Name: | Paul Hutchinson | David Elliott |
| Signature: |  |  |
| Position: | Sustainability and Compliance Director | Chief Executive |
| Date: | 08/05/2024 | 08/05/2024 |