

Anti-Slavery and Human Trafficking Policy Statement

This policy statement ensures that Nationwide Engineering Ltd complies with section 54 of the Modern Slavery Act 2015, and sets out the responsibilities for Nationwide Engineering Ltd, our employees, suppliers, and subcontractors.

Nationwide Engineering Ltd is committed to ensuring that all its business operations are free from involvement with slavery or human trafficking.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery, and we are committed to:

- Acting ethically and with integrity in all our business dealings and relationships
- Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners.

As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy:

- Applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- Does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility For The Policy

The Directors, supported by all our Management Team, has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

The Assurance and Compliance Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

All staff and employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Assurance and Compliance Manager.

ISSUE: D09 23/07/24	NWE/POL/011	Page 1 of 3
------------------------	-------------	---------------

Compliance With The Policy

This policy document will be made available to all employees who must ensure that it is read, understood, and complied with at all times.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

All employees, suppliers, and subcontractors:

- Are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- To notify their Line / Senior Manager or Company Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.
- Are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If it is believed or suspected that a breach of this policy has occurred, or that it may occur, all employees, suppliers and subcontractors must notify their Line Manager, a Senior member of our Site Management Team or Company Director and report it as soon as possible.

Please note that, where appropriate, and with welfare and safety for all as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains.

If any individual is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they should raise it with their Line Manager, a Senior member of our Site Management Team or Company Director.

We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

If any individual believes that they have suffered any such treatment, they should inform their Line Manager or Company Director immediately.

If the matter is not remedied, and the individual is an employee, they should raise it formally using our existing grievance procedures.

Communication And Awareness Of This Policy

Awareness training on this policy, and on the risk our business faces from modern slavery in its supply chains:

- Forms part of the induction process for all individuals who work for or on behalf of us at our places of work.
- Will, in addition to guidance notes issued to Senior Managers, be provided as required.
- Will be provided for specific projects / locations if identified as High Risk during the pre-construction / construction risk assessment process.

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors, and business

ISSUE: 2026	NWE/POL/011	Page 2 of 3
----------------	-------------	---------------

partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

We will ensure that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act.

Annual statement

Nationwide Engineering Ltd will publish an annual slavery and human trafficking statement and this will be signed and approved by our Chief Executive Officer who has the responsibility for ensuring that this statement is published and reviewed on an annual basis.

The statement will explain the steps that Nationwide Engineering Ltd has taken to ensure that slavery and trafficking are not taking place in any of our supply chains, or in any part of our own business.

The following items will be included in the statement:

- The structure of:
 - Our organisation
 - Our business operations
 - Our supply chains
- Our policies in relation to slavery and human trafficking.
- The due diligence processes that we carry out to ensure that there is no slavery or human trafficking in our business and supply chains
- Identification of any parts of our business and supply chains where there is a risk of slavery or human trafficking take place, and the steps that we have taken to assess and manage the risk particularly in high risk areas
- An assessment of the effectiveness of the measures that we have taken to stop slavery and human trafficking taking place, and the way that we assess and manage the risks that are identified
- A statement that awareness training about slavery and human trafficking is available to all employees

Breaches Of This Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

In support of our zero tolerance approach we will, if as a result of investigation it is deemed appropriate, terminate our relationship with any individuals and organisations working on our behalf if they breach this policy.

Monitoring, Auditing and Review

This policy will be reviewed annually to coincide with the preparation and publication of the Annual Statement and at other intervals that may be required following:

- Further changes in the published, or similar aligned, legislation
- As a result of issues raised by regular audits
- Following any investigation into issues or concerns raised by our staff, employees, subcontractors, suppliers plus other interested third parties
- The results of monitoring, audit and review of our existing aligned policies and procedures for example, Industrial Audits, Salary/Wage Surveys and Right to Work Checks

Signature

Date

Title



25/3/2026

Managing Director

P Fennessy

ISSUE: 2026	NWE/POL/011	Page 3 of 3
----------------	-------------	---------------

Annual statement 2025-2026

Nationwide Engineering Ltd will publish an annual slavery and human trafficking statement. This statement has been approved by the Managing Director, who has responsibility for ensuring that the statement is published and reviewed on an annual basis.

This statement explains the steps that Nationwide Engineering Ltd has taken during the financial year **2025–2026** to ensure that slavery and human trafficking are not taking place in any part of our own business or within any of our supply chains.

The structure of:

Our organisation

Nationwide Engineering Ltd is a UK-based engineering organisation delivering engineering and construction-related services. Our business is supported by defined management, assurance and compliance functions to ensure that our legal and ethical obligations are met. Responsibility for preventing modern slavery is embedded at all levels of the organisation.

Our business operations

Our operations include the delivery of engineering services through directly employed personnel and through approved subcontractors and suppliers. All individuals working for or on behalf of Nationwide Engineering Ltd are required to comply with our Anti-Slavery and Human Trafficking Policy and our zero-tolerance approach to modern slavery.

Our supply chains

Our supply chains consist primarily of UK-based suppliers providing labour, materials, plant, equipment and specialist services. We expect all suppliers, contractors and business partners to uphold the same high standards and to ensure that slavery and human trafficking do not take place within their own businesses or supply chains.

Our policies in relation to slavery and human trafficking

Nationwide Engineering Ltd operates a zero-tolerance approach to slavery and human trafficking, as set out in our Anti-Slavery and Human Trafficking Policy. This policy applies to all employees, agency workers, subcontractors, suppliers and business partners and is communicated at the outset of our business relationships and reinforced as appropriate.

Due diligence processes

Nationwide Engineering Ltd carries out due diligence to ensure that slavery and human trafficking are not taking place within our business or supply chains. These processes include robust supplier selection procedures, contractual requirements prohibiting forced or trafficked labour, right-to-work checks, internal audits and ongoing monitoring of suppliers and subcontractors.

Risk identification and management

We recognise that the engineering and construction sector can present a higher risk of modern slavery, particularly where subcontracted labour is used. We identify and assess risks through supplier assessments, project-specific risk reviews and direct monitoring.

Where higher-risk areas are identified, additional controls and monitoring measures are applied to manage and mitigate those risks effectively.

Effectiveness of measures

Nationwide Engineering Ltd monitors the effectiveness of the measures taken to prevent modern slavery through management review, audits and supplier engagement.

During the 2025–2026 financial year, no breaches of our Anti-Slavery and Human Trafficking Policy were identified and no concerns were raised.

This provides assurance that our robust supplier selection processes and direct monitoring arrangements within our supply chain are working effectively.

Training and awareness

Awareness training on slavery and human trafficking is available to all employees and forms part of our induction process. Additional training and awareness briefings are provided where required, including for higher-risk projects or locations.

Continuous improvement

During the **2026–2027** financial year, Nationwide Engineering Ltd will continue to develop its approach by increasing awareness through briefings and training, strengthening direct monitoring activities and enhancing supplier engagement and oversight.

The **Managing Director** will maintain overall responsibility for the implementation of these development plans, supported by the relevant business functions within the organisation and throughout our supply chain.

Signature

Date

Title



25/3/2026

Managing Director

P Fennessy

ISSUE: 2026	NWE/POL/011	Page 4 of 3
----------------	-------------	---------------