

Lanes Group is a leading provider of utilities and infrastructure services in the UK & Ireland. The Group serve a broad range of sectors, and its specialist subsidiaries and service divisions support industries including water and wastewater, construction, highways, and rail.

In establishing a Modern Slavery and Human Trafficking policy, the Group recognises factors that can increase the risk of modern slavery and human trafficking and have established the policy to prevent and reduce such risks and exploitation across the Group and its supply chain.

The policy is applicable to Lanes Group, and its subsidiary companies residing and operating in the UK & Ireland, including:

- UK: Sapphire Utility Solutions Ltd, Lanes-I Ltd, UKDN Waterflow, Clear-Flow Ltd, and S&C Fosters Ltd.
- Republic of Ireland: Trading as AQS Environmental Solutions, Acorn Recycling Ltd and AQS Compositing Ltd.

Purpose

Lanes Group acknowledges their responsibilities in respect of the Modern Slavery Act 2015 within the UK; Human Trafficking and Exploitation (Scotland) Act 2015 for operations in Scotland; and for the Republic of Ireland with respect to Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013. Through the policy statement and measures taken, Lanes Group will ensure transparency within the organisation and with suppliers of goods / services to the organisation, as well as the main supply chain for Lanes Group.

The statement confirms that modern slavery risks relate to exploitation of children and adults in slavery, servitude, or forced or compulsory labour, and human trafficking is the recruitment, movement, harbouring, or receiving of children, and of adults through coercion, deception, or force, for the purposes of exploitation. Victims of modern slavery and human trafficking include those who have been brought from overseas or are vulnerable people in the UK and in Ireland who are forced to work illegally against their will.

Organisational Structure & Responsibilities

Lanes Group is committed to acting ethically and with integrity in all its business dealings and relationships, and to take appropriate and proportionate steps to ensure acts of modern-day slavery and human trafficking do not occur within its business or from within its supply chains, including suppliers, contractors, sub-contractors, and partners.

Directors, senior management, and all managerial staff shall take responsibility for implementing this policy, its commitments and shall provide adequate resources (including

information, instruction, monitoring, and reporting of issues etc.) and investment to ensure this policy statement is adhered to.

The Lanes Group designated Modern Slavery Lead is appointed by the Lanes Group Board of Directors and is the Exec Sponsor. The lead is responsible for documenting and reviewing performance against the policy; including commitment to prevent risk of modern slavery and human trafficking, and that the Group processes provide assurance that relevant laws, regulations, and industry standards are upheld.

Where Lanes Group acquires another organisation, this policy shall apply to its operations and a compliance check against the requirements of the policy shall be undertaken within the first 100 days.

Supply Chains and Supply Chain Due Diligence

As part of the Lanes Group's due diligence processes into modern slavery and human trafficking the supplier approval process incorporates a review of the controls undertaken by the suppliers of goods and services. Lanes Group recognises that exposure to slavery and human trafficking risk when procuring products and services from suppliers and that some industries have a higher risk of modern-day slavery. Most suppliers to Lanes Group have operations situated in the UK and Ireland and are subject to regular review through the Group approved supplier process.

Goods with the potential to be imported from sources outside the UK and EU are assessed to prevent, mitigate, and reduce risk of incidents of modern slavery and human trafficking having taking place within the supply chain.

Lanes Group therefore has a focus on prevention and will not knowingly support or work with organisations knowingly involved in modern slavery or human trafficking. In contracting with suppliers, the Group process is designed to manage and mitigate risks through our supply chain. In addition, we shall support our clients to reduce risks through working in collaboration.

Risk Assessment & Management

All Lanes Group supply chain is vetted and categorised via a 'Tier' system (Tier's 1-7). The whole supply chain is vetted every 3 years including a review of all High & Medium risk suppliers and subcontractors annually. Constructionline is also utilised to support pre-qualification of subcontractors; recognising that there is a higher risk of modern slavery and human trafficking within some sectors such as the construction industry. Additional checks are carried out on suppliers of agency and temporary workers through the Lanes Group Recruitment and Selection process.

Lanes Group holds a list of all suppliers and contractors via an internal system which all employees have access to. If a supplier or contractor doesn't appear this means they have not been approved via the Lanes Group supply chain process.

All employees are required to follow the 'Group Procurement New Supplier Onboarding' process map with regards to supply chain queries.

Transparency and accountability will be maintained, with any findings recorded and appropriate action(s) taken. Communication will be sent to relevant stakeholders, highlighting the steps being taken to combat modern-day slavery. In addition, as a supplier, Lanes Group will cooperate with its clients' requirements and audits on modern slavery and human trafficking. Audit findings are proactively reviewed to support continual improvement actions via our modern slavery compliance plan.

Training & Awareness

Lanes Group raises awareness on modern slavery and human trafficking issues through:

- Management – Any modern-day slavery concerns should be raised to the Lanes Group Designated Modern Slavery Lead or via the Whistleblowing Policy.
- Communication – This policy is updated annually and communicated out to all employees via staff noticeboards, the company Integrated Management System (IMS), annual updated Toolbox Talks, via the company website and is made available on the gov.website.
- Learning and Training – Modern Slavery e-learning modules and toolbox talks, and mandatory induction for all employees.
- Monitoring - Modern Slavery questions integrated into the internal IMS audit question set. To monitor and measure the understanding of modern-day slavery across all subsidiaries, depots, and departments.

Measures and Key Performance Indicators (KPIs)

The following measures and KPIs are taken to support the effectiveness of preventing modern slavery and human trafficking:

- Group procurement process to maintain an approved list of suppliers across Lanes Group, and to ensure that suppliers are regularly reviewed for compliance with relevant legal and other requirements.
 - KPI: % of approved suppliers provide a modern slavery policy statement or agree to adhere to Lanes Group policy where their turnover is below £36million.FY2024 performance: 100%

- KPI: % of planned supplier audits conducted including risks and ethics.
 - FY2024 performance: N/A new KPI for FY2025 onwards. Audit checklist and programme planned.
- To measure the percentage of employees and suppliers who have completed modern slavery awareness training.
 - KPI: % of new employees complete Lanes Group induction.
 - FY2024 performance: 86% not accounting for subsidiary employees. Subsidiary employees to be included from FY2025 onwards.
 - KPI: % of leadership and management employees completed e-learn module.
 - FY2024 performance: 55%.
- Track the number of investigations initiated in response to reports of modern slavery or human trafficking. Ensuring that all reports are thoroughly investigated, and appropriate actions are taken.
 - KPI: number of incidents of human rights issues within reporting period.
 - FY 2024 performance: zero incidents.
- Measure the number of open corrective actions taken following the identification of modern slavery incidents.
 - KPI: number of corrective actions open within reporting period.
 - FY 2024 performance: zero open actions.
- Feedback from employees, suppliers, and clients regarding the effectiveness of modern slavery policies and processes. In order to identify areas for improvement and ensure that the policy is effective.
 - KPI: number of actions or opportunities for improvements raised from audits.
 - FY 2024 performance: zero action or opportunities for improvement raised.
- Track the reduction in the number of high-risk suppliers over time. This will reduce the overall risk of modern slavery within the supply chain.
 - KPI: supply chain heat map assessment and change to risk level.
 - FY 2024 performance: N/A new KPI for FY2025 onwards.
- Pre-employment screening system in place to support right to work compliance
 - KPI: system in place for verification checks.
 - FY 2024 performance: Pre-employment screening process in place and to

continually improve in the year the Group have begun to adopt an app-based platform called Rightcheck. The Rightcheck verification system adopted across Lanes Group in UK is to be complete by quarter 1 of 2026.

Reporting

Lanes Group encourages employees, workers, suppliers, and partners to raise any concerns.

A whistleblowing policy is in place to support concerns being raised without fear of reprimand. If you suspect that someone might be a victim of modern slavery or human trafficking or any issues have been identified, please contact SpeakUp@lanesgroup.co.uk or follow the whistleblowing process for anonymous and confidential reporting.

Resources

The following resources are available to support victims of modern slavery:

Modern Slavery Helpline is based in the UK and provides information, advice, and guidance about modern slavery issues.

Telephone: 0800 012 1700

Email: <https://www.modernslaveryhelpline.org>

The Salvation Army offers specialist support for survivors of modern slavery, including a 24/7 confidential referral advice line.

Telephone: 0800 808 3733

Email: <https://www.salvationarmy.org.uk/modern-slavery>

GOV.UK Resources provides statutory guidance on identifying and supporting victims of modern slavery, including the process for determining victim status.

Email: Visit the GOV.UK modern slavery guidance page3.

<https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

Commitments

Lanes Group expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery and human trafficking:

- Our approach is to ensure that modern slavery, human trafficking, or exploitation are not knowingly present within our organisation or supply chain. Our focus is on proactively identifying, managing, and mitigating risks. We adopt a zero-tolerance approach to inaction or concealment, recognising that addressing issues transparently is as critical as preventing their occurrence.

- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery and human trafficking in our operations and supply chain.
- The prevention, detection and reporting of modern slavery and human trafficking in any part of our organisation or supply chain is the responsibility of all those working for us, with us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
- If any individuals or organisations working with us or on our behalf have breached this policy, Lanes Group will ensure that appropriate action is taken.
- Actions to continually improve on the risk of Modern Slavery is included within the Group business risk register, risk assessment, and objectives. These documents will be reviewed annual or if any legislation has changed/updated.

A copy of this policy will be accessible to all employees electronically and can be obtained from the IMS or viewed on the Lanes Group website.

This policy should be read in conjunction with the following:

- Anti-Bribery Policy
- Corporate Code of Conduct
- Sustainable Procurement Policy
- Whistleblowing Policy
- Recruitment and Selection Procedure

The policy statement and actions taken within the year will be reviewed at least annually, and in line with the required Group disclose.

On behalf of the Lanes Group Board of Directors the policy statement is approved by:

Wayne Earnshaw



Chief Executive Officer of Lanes Group Ltd
5th November 2025