Anti-slavery & human trafficking

Modern Slavery & Human Trafficking Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps Knights Brown has taken during the financial year ending 31 March 2026 to prevent modern slavery and human trafficking in our own operations and supply chains. It has been approved by the Board of Directors and is intended to be read alongside our Anti-Slavery and Human Trafficking Policy and related governance documents.

Introduction

We recognise that modern slavery is a serious crime and a violation of fundamental human rights. Although we assess the risk within our directly employed workforce as low, we remain vigilant to the risk of exploitation within construction supply chains, labour provision, subcontracted works and the sourcing of materials and manufactured products. All employees, workers and managers are expected to understand and comply with our Anti-Slavery and Human Trafficking Policy and to report any concerns without delay. The policy is available via our intranet, management system and website.

Managers are required to take prompt and appropriate action in response to concerns raised internally or externally, including escalation through the relevant HR, commercial, procurement, operational or whistleblowing channels.

During the reporting period, no confirmed instances of modern slavery were identified within our business or supply chain. We recognise, however, that the absence of reported cases does not remove the need for ongoing vigilance, engagement and due diligence.

Our Organisation and Structure

Knights Brown is an independent, multi-disciplinary construction company operating in the UK, with turnover exceeding £130 million. We deliver civil engineering and construction projects with certainty, clarity and collaboration across southern England, Wales and the UK's energy network.

We are committed to working ethically, responsibly and collaboratively with our employees, workers, customers, suppliers and subcontractors.

Our head office and a regional office are located in Ringwood, Hampshire, with an additional regional office in Bridgend, Wales and satellite offices in Maidstone, Norwich and Dunfermline. We employ approximately 375 staff and engage around 70 freelance staff. We also work with a small number of labour agencies and a broad subcontractor and supplier base to support delivery across our projects.

Our Policy on Anti-Slavery and Human Trafficking

We are committed to conducting business ethically and with integrity. We maintain policies, controls and governance arrangements designed to reduce the risk of modern slavery and human trafficking occurring within our business or supply chain, and to support appropriate action where concerns are identified.

Our guiding principles set out the behaviours and standards we expect from our people and business partners. These are supported by policies and procedures that promote ethical conduct, responsible procurement, fair treatment and safe reporting, including:

- Anti-Bribery Policy – Outlines our stance on bribery and corruption.
- Modern Slavery and Human Trafficking Policy – Details our approach to identifying and addressing modern slavery risks.
- Procurement and supplier assessment processes – Supports proportionate due diligence before and during supplier engagement.

- Right-to-work and recruitment controls – Ensures that employees and workers have the legal right to work and are recruited through appropriate channels.
- Whistleblowing Policy – Provides a confidential mechanism for reporting concerns, available to both employees and workers.

Our Supply Chain

Our supply chain includes approximately 550 subcontractors, alongside suppliers of materials, plant, manufactured products and professional services. The nature of construction means that our supply chain can be tiered and fragmented, and may involve labour-intensive activity, agency labour and materials sourced through wider national and international supply chains.

We recognise that the areas of greatest potential exposure include subcontracted site works, temporary or agency labour, and goods or materials sourced from complex or lower-visibility supply chains. To mitigate these risks, we:

- Foster long-term relationships with suppliers and clearly communicate our expectations.
- Require subcontractors to demonstrate compliance with our anti-slavery commitments as part of our vendor assessment process.
- Request evidence of suppliers' modern slavery policies or adherence to ours via a supplier declaration.
- Continue to review supplier engagement and onboarding processes to improve visibility across tiered and fragmented supply chains.
- Audit labour agencies to ensure they have conducted right-to-work checks.
- Work with a sole supplier in southern England to better manage recruitment and have introduced a Preferred Supplier List for our Wales, Energy and Water Divisions.
- Encourage all individuals to challenge unethical behaviour and report concerns. In 2026, we introduced an independent whistleblowing portal, publicised on sites, to provide an additional route for workers and supply chain personnel to raise concerns anonymously.
- Implemented an online site induction for all workers, including agency and supply chain personnel, to enhance scrutiny of qualifications.
- Are committed to prompt payment, aiming to meet the Fair Payment Code's silver standard of all supply chain invoices being paid within 60 days, with small business suppliers being paid within 30 days. Performance data is available on our website.
- Expect suppliers and subcontractors to cooperate with reasonable information requests, audits or corrective action plans where modern slavery risks or concerns are identified.

Due Diligence and Risk Management

Our due diligence approach is proportionate to the nature of the goods or services supplied and the level of potential risk. We have engaged with over 400 suppliers in the materials and plant sectors. To date, we have contacted 347 of them regarding their anti-slavery policies and continue to work towards full coverage, either through confirmation of adherence to our policy requirements or recognition of suppliers' own modern slavery policies. Our buying team are continuing this work during 2026-2027.

In January 2025, we introduced an Identity Services Provider to support right-to-work checks for all new employees. This is part of our recruitment and onboarding process, with hiring managers trained on the requirements. Our HR system also supports onboarding compliance, policy access and training delivery. This year, we intend to extend this service to incorporate freelance self-employed.

In January 2026, we undertook an audit of our agency supply chain and began more detailed audits with selected agencies, prioritising new agencies and those operating in new regions. Where improvement areas are identified, we will agree appropriate follow-up actions and monitor progress.

We have also updated our agency terms of business, strengthening the requirements of agencies and the audit process.

Our risk management activity includes reviewing supplier declarations, assessing labour agency controls, strengthening site induction processes, and maintaining reporting routes for employees, workers and supply chain personnel. We will continue to develop our approach to supplier segmentation and risk-based scrutiny as our supply chain and regional footprint evolve.

Measuring Effectiveness

We monitor the effectiveness of our approach through a combination of supplier engagement, right-to-work compliance, agency audit activity, training completion, whistleblowing reports and management review. During the reporting period, no confirmed modern slavery incidents were identified. Our focus for the next reporting period is to improve the consistency of supplier evidence, complete further agency reviews and continue embedding modern slavery awareness through induction, training and site communication.

Training

We provide modern slavery awareness training to relevant employees and consultants. Training covers individual responsibilities, indicators of exploitation, reporting routes and the action to take where concerns arise. Training is delivered on joining and refreshed every three years, or sooner where required by changes in risk, process or legislation.

Directors have been briefed on modern slavery and human trafficking risks, including the importance of Board oversight, responsible procurement and transparent annual reporting.

We will continue to review the scope, frequency and effectiveness of training so that those in higher-risk roles, including procurement, commercial, operational and hiring teams, understand the risks most relevant to their responsibilities.

Kevin Valentine | Group Managing Director | 07 September 2026

This policy was approved electronically. Proof of signature can be made available on request.