

ANNUAL MODERN SLAVERY STATEMENT

Introduction and C.R. Reynolds Limited's Structure and Business

C.R. Reynolds Limited are a privately owned and run organisation, based in Hessle, which has been working in the UK Civil Engineering and Construction industry for over 40 years. Over this time, we have grown into a well-respected and highly regarded Principal Contractor with experience in the successful delivery of a wide range of civil engineering and building projects across the UK. Our sustainable and continued growth has been driven by the high-quality services we have offered to the Public Sector, particularly in the construction and maintenance of highways, bridges, public realm, and our work within the rail sector.

C.R. Reynolds Limited's Supply Chain

C.R. Reynolds Limited's supply chain consists mainly of UK-based:

- Subcontractors employed to deliver specialist works packages as part of C.R. Reynolds Limited's projects.
- Suppliers of plant, equipment, and materials
- Labour agencies providing operatives to work under C.R. Reynolds Limited supervision on C.R. Reynolds Limited projects.
- As part of our commitment to sustainable procurement we always look to local resources in the area of UK we may be working in, to this end we fully vet all of our suppliers to ensure they stand up to our policies and high ethical values.

C.R. Reynolds Limited's Policies in Relation to Modern Slavery

C.R. Reynolds Limited is committed to ensuring, as far as possible, that there is no modern slavery or human trafficking in our supply chains or in any part of our business and we take a zero-tolerance approach to slavery and human trafficking.

C.R. Reynolds Limited operates a modern, robust integrated management system designed to manage all manner of risk across all business operations. This integrated system includes:

- Management systems certified to the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018.
- This Annual Modern Slavery Statement.
- Modern Slavery and Human Trafficking Policy.
- Corporate Social Responsibility Policy.
- Eligibility to Work in the UK Policy.

- Equal Opportunities Policy.
- Anti-Bribery & Corruption Policy.
- Company supply chain procurement procedures.
- Recruitment procedures, including process for inductions.
- C.R. Reynolds Limited's Terms and Conditions for Subcontractors.
- Whistleblowing Policy.
- Strong supplier assessment process.

Our company IMS policies, procedures, and associated documents are freely available to all staff via our integrated management system and to external parties on request. Key policies, such as our Modern Slavery & Human Trafficking Policy statement are also available to download via our company website.

In adhering to these policies and procedures, C.R. Reynolds Limited will:

- Include, as part of our contracting processes, obligations to ensure compliance with the requirements of the Modern Slavery Act 2015.
- Encourage openness and provide support to anyone who raises genuine concerns in good faith in relation to this policy, even if they turn out to be mistaken. C.R. Reynolds Limited are committed to ensuring that no one suffers any unfair treatment because of reporting suspicions that modern slavery in whatever form is, or may be, taking place in any part of our own business or in the businesses of any of our supply chains.
- Through our thorough procurement pre-approval and appointments procedures, communicate our zero-tolerance approach to modern slavery within our supply chain and business partners, prior to engaging them.

C.R. Reynolds Limited Due Diligence in Assessing and Managing the Risk of Modern Slavery in its Business and Supply Chain

We have reviewed our exposure to the risk of Modern Slavery across all aspects of our business, and consider our key risk areas to be:

- Employment practices of labour agencies providing temporary and agency workers.
- Subcontractor relationships, where we consider employment and payment practices.
- Suppliers, where we assess risk based on geography, material or component type and our relationship with the supplier.

All our direct employees are paid in accordance with UK legislation, and this is kept under regular review. Our employment policies and procedures include all relevant checks, such as an individual's right to work in the UK.

We expect all agency staff providers to be able to satisfy us that staff all have written employment contracts, have not had to pay for the opportunity to work, and are legally able to work within the UK. Within the process for using such agencies, we will take consideration of each agency's ability to respond to our requests for compliance.

Our subcontractor approval process includes a check on each proposed company's own modern slavery policies. This is also included as part of our annual subcontractor review process. All subcontractors working for C.R. Reynolds Limited must agree to C.R. Reynolds Limited Terms and Conditions for Subcontractors, which includes stipulations relating to Modern Slavery.

C.R. Reynolds Limited aims to build long-lasting relationships with known subcontractors and suppliers but will ensure appropriate checks are undertaken on any new supply chain partners to cover the associated level of risk.

C.R. Reynolds Limited aims to use local subcontractors and suppliers wherever possible and expects suppliers to be able to demonstrate transparency and traceability in relation to the upstream supply chain. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

C.R. Reynolds Limited's Actions, Targets and Performance Indicators in Prevention of Modern Slavery

- Zero instances of modern slavery issues within our business or supply chain.
- 100% of any reported issues to be investigated, and any individuals reporting issues to be treated fairly, without repercussion.
- 100% of C.R. Reynolds Limited new staff to be briefed on the company's Modern Slavery Policy as part of company induction procedures.
- 100% of visiting subcontract employees to be briefed on Modern Slavery awareness through site inductions.
- 100% adherence to our procurement policies and procedures across all our projects
- 100% of new subcontractors and suppliers to be subject to our pre-approval checks prior to any orders being placed.
- Provide relevant information regarding modern slavery to staff through access to recognised sources.

No modern slavery issues were identified or reported within our business or supply chain during 2024.

Training and Building Capacity Amongst Staff

C.R. Reynolds Limited has policies and procedures in place aimed at providing training, information and guidance to all persons working for C.R. Reynolds Limited on identifying modern slavery, how, and to whom to make a report. Training will also include the role that all individuals involved with our business must play in ensuring compliance with the Modern Slavery Act.

Our training is delivered as part of staff and individual site inductions. Staff are also required to attend any training bespoke sessions and workshops, organised by the company, regarding identifying and reporting modern slavery, human trafficking, and illegal workers.

With these policies and procedures in place, we are satisfied that C.R. Reynolds Limited is taking appropriate steps to ensure that slavery and human trafficking is not taking place in any parts of our business or supply chain. C.R. Reynolds Limited will monitor the effectiveness of the steps we are taking on an ongoing basis and report on any relevant additional steps in our next annual statement under the Modern Slavery Act.

The company's Managing Director/CEO has approved this statement, and we commit to reviewing and publishing this statement annually.

A handwritten signature in blue ink, appearing to read 'Chris Reynolds'.

Signed:

Print: Chris Reynolds

Position: Managing Director/CEO

Dated: 28/05/2025