

Modern Slavery Statement 2026

Introduction

This is the tenth Modern Slavery Statement prepared by RJ McLeod (Contractors) Limited. The statement is made pursuant to section 54(6) of the Modern Slavery Act 2015. This document covers the trading year to 29th April 2026 and sets out the steps that we have taken and the processes and practices we adopt to ensure that modern slavery or human trafficking is not taking place within our business or our supply chain.

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, 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. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Our approach to business is guided by a commitment to operating responsibly, ethically and sustainably. We seek to create long-term value for all our stakeholders, including shareholders, clients, employees, suppliers and contractors, business partners, local communities and members of the public. We believe sustainable growth can only be achieved through conduct that is fair, transparent and honest, and by treating all stakeholders with respect and integrity. A key part of this is ensuring that we do not engage directly or indirectly in slavery or human trafficking, and this is a key priority for our Board of Directors.

We are committed to ensuring that 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 UK Modern Slavery Act 2015.

We expect the same high standards from all our contractors, suppliers and other business partners, and, 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. We expect our suppliers to hold their own suppliers to the same high standards.

Our Business, Operations & Supply Chain

RJ McLeod – part of the OCU Group - operates in the renewable energy and civil engineering sectors working from offices in Glasgow, Dingwall and Stocksfield. We are one of Scotland's largest privately owned renewable energy and civil engineering companies, employing approximately 600 staff and operatives, a large proportion of whom are long serving. This helps to enhance our reputation as an employer of standing. Our staff retention is very high with an attrition rate of c. 7%.

Since our formation in 1951, we have been associated with a variety of civil engineering disciplines. Today our portfolio includes energy – generation, transmission and storage, site infrastructure, public realm, both local and national road construction, marine, waterways and land remediation and development.

We work solely in the UK. Being a civil engineering organisation, our principal suppliers provide goods such as concrete, aggregates, pipes, reinforcing steel and the like and are similarly based in the UK. Our subcontractors are also predominantly UK-based companies and supply the construction disciplines which we do not provide in-house such as piling, road surfacing, landscaping, electrical services, fencing etc. We

also use labour-only subcontractors for carrying out steel fixing and joinery works as well as to complement our own labour workforce where required.

Over the years we have developed a tried and tested supply chain where mutual respect has been key to the success of the business.

Our Approach & Governance

RJ McLeod is committed to conducting business in a lawful, ethical and transparent manner. Our approach to preventing and addressing modern slavery is supported by Companywide governance arrangements, policies, labour controls, procurement processes and reporting channels, supported and led by local practice. Responsibility for oversight sits with senior leadership and the Board, supported by relevant Group functions including Legal & Compliance, Procurement, Commercial, Human Resources, Finance and operational management teams.

Policies Against Modern Slavery and Human Trafficking

Our approach is informed by the Group Code of Conduct and related OCU Group and RJ McLeod policies, including this Modern Slavery Statement, and The Companies Anti-bribery and Corruption policy, Corporate Social Responsibility Statement, Sustainability Policy and Policy for Raising Matters of Concern.

We are committed to the principles enshrined in the International Labour Organisation Conventions and the United Nations Convention on the Rights of the Child and expect our suppliers and subcontractors to operate to standards consistent with our own. Our contracts and supplier controls are designed to reinforce this expectation and provide mechanisms for escalation where concerns are identified.

These policies communicate our expectations in relation to ethical conduct, labour standards, reporting of concerns and compliance with applicable law and are intended to support lawful and ethical conduct, communicate expectations to employees and third parties, and provide mechanisms for raising and addressing concerns.

Modern Slavery Risks in Our Operations & Supply Chain

For the purposes of this Statement, the risk of modern slavery means the potential for the Company to cause, contribute to, or be directly linked to slavery, servitude, forced labour, child labour or human trafficking through its operations or supply chains.

We consider the inherent risk within our direct operations to be lower relative to certain parts of our supply chain, due to our employment controls, recruitment practices, oversight of labour arrangements and the transparency of our internal systems, although we do not consider risk to be absent from our operations. We recognise that risks may still arise in our own operations, particularly where contingent labour, temporary workers, labour providers, subcontracted labour or vulnerable worker populations are involved. The principal areas in which modern slavery risk may arise for RJ McLeod are:

Contingent labour and labour supply chains, including the use of agency workers, temporary workers and labour-only subcontractors, where risks may arise from deceptive recruitment practices, worker vulnerability, unlawful deductions, debt bondage or inadequate oversight.

Construction and project delivery activities, where high labour demand, subcontracting models and site-based delivery can increase exposure to labour exploitation risks, particularly where migrant workers are involved.

Procurement of goods and materials, particularly where supply chains are complex, global or involve categories that may present elevated risk, such as certain manufactured goods, steel products, electrical components, solar-related products or other goods sourced through higher-risk sectors or jurisdictions.

Partnering and subcontracting arrangements, where RJ McLeod may not exercise the same degree of direct control as it does when self-performing work

Lower-skilled, vulnerable or economically exposed workers, who may be at greater risk of exploitation due to language barriers, dependency on intermediaries, limited awareness of rights or wider economic pressures.

We also recognise that modern slavery risk can be influenced by geography, commodity type, labour model and the maturity of a supplier's own governance arrangements.

Actions Taken to Assess & Address Modern Slavery Risks

The Company applies a risk based due diligence framework to modern slavery risks across its operations and supply chains. This framework includes: (i) identifying risk, (ii) assessing risk, (iii) implementing controls and mitigation measures, (iv) monitoring effectiveness, and (v) escalating and remediating issues where necessary.

Risk Identification & Assessment

We assess modern slavery risk through a combination of internal and external information sources, including the nature of goods and services procured, the use of subcontract or labour only models, country and sector risk indicators, supplier history and performance, and operational knowledge from procurement, commercial and operational project teams.

RJ McLeod has also developed a risk-based approach to supply chain profiling, including supplier heatmapping process to help provide oversight. Our approach considers that risk may be higher where goods or services are sourced from sectors or jurisdictions associated with weaker labour protections or where supply chains are more complex and less transparent.

Supplier Onboarding and Due Diligence

As part of onboarding new suppliers and reviewing existing suppliers, the Company undertakes due diligence intended to identify and mitigate modern slavery risk. This includes risk assessment of new suppliers, periodic review of supplier arrangements, checks on labour related controls where relevant, and the use of centralised subcontractor diligence processes. Supplier diligence is ongoing and may be revisited where there is a change in scope, contract, geography or working arrangements.

We also seek to assess whether suppliers and subcontractors have appropriate controls of their own, including compliance with applicable laws, ethical labour practices and appropriate escalation channels. Where relevant, we request or review suppliers' own modern slavery statements and supporting information.

Contractual Controls and Supplier Expectations

The Company Communicates its expectations to suppliers and subcontractors through its policies, contractual arrangements and supplier standards. Our standard terms and conditions include provisions requiring suppliers and subcontractors to comply with applicable laws and to ensure that modern slavery or human trafficking is not present in their business or supply chains. We reserve the right to take action, including corrective action or termination of the relationship, where serious breaches are identified. Our supply chain policies set expectations in areas such as:

- compliance with minimum age requirements and applicable wage laws;
- prohibition on charging recruitment fees to workers or using misleading recruitment practices;
- protection of workers' identity and immigration documents;
- provision of channels for workers to raise concerns without retaliation; and
- cascading equivalent expectations through suppliers' own supply chains.

Workforce & Labour Controls

The Company maintains employment and labour controls designed to reduce the risk of exploitation within its workforce and labour supply arrangements. These include right-to-work checks, identity verification processes and tools, employment reference checks, payroll controls and checks on payment arrangements. We recognise that labour supply chains can present elevated risk, particularly where third-party labour providers are used. Accordingly, we seek to ensure that personnel provided through third parties are engaged lawfully and transparently, and that payment and recruitment arrangements are subject to appropriate scrutiny.

Additional local or business specific controls may also apply, including subcontractor checklists, site-based monitoring, worker communications, induction materials and practical awareness measures intended to support early identification of red flags.

Monitoring, Audit & Corrective Action

The Company uses a range of monitoring activities to support its approach, including supplier reviews, project and site oversight, payroll auditing, subcontractor diligence, internal oversight and third-party audit activity where relevant.

Where concerns or weaknesses are identified, RJ McLeod may work with suppliers to implement a corrective action plan within an agreed timeframe. Where a supplier fails to improve or where a serious breach is identified, sanctions may be applied up to and including termination of the relationship.

Remediation

The Company maintains confidential reporting arrangements through its Policy for Raising Matters of Concern. RJ McLeod does not tolerate retaliation against anyone who raises a genuine concern in good faith. Concerns are assessed and addressed by the relevant internal teams, including the Directors and Legal & Compliance team.

During the reporting period, the Company did not identify any confirmed instances of modern slavery or human trafficking within its operations or supply chains requiring formal remediation. However, we recognise the importance of maintaining mechanisms capable of identifying, escalating and addressing concerns if they arise.

Where modern slavery risks or incidents are identified, the Company is committed to taking appropriate remedial action, including working with suppliers to address issues, supporting affected individuals where possible, and, where necessary, terminating relationships.

Training and Awareness

The Company provides modern slavery awareness training through its onboarding and compliance arrangements. For office-based employees and site operatives, induction processes include awareness of modern slavery risks and reminders of how to raise concerns through independent reporting channels. Within operational environments, awareness may also be reinforced through toolbox talks, project or site inductions, safety stand-downs, subcontractor communications and, where appropriate, posters or multilingual awareness materials. These practical measures support visibility of expectations and escalation routes at site level.

Training is designed to help employees understand the warning signs of modern slavery and human trafficking, recognise red flags in labour and supply chain arrangements, and know how to escalate concerns appropriately. Participation in compliance and ethics training is monitored through Group processes and overseen by the Group Audit & Risk Committee.

Assessing the Effectiveness of Our Actions

The Company assesses the effectiveness of its actions to address modern slavery risk through a combination of qualitative and quantitative indicators. These include review of due diligence activity, supplier risk assessments, audit findings, training completion, workforce verification controls, contractual compliance, use of reporting channels and the status of any corrective action plans.

During the reporting period, these measures were used to monitor supplier compliance, workforce assurance and escalation activity:

- the proportion of relevant suppliers subject to modern slavery risk assessment or review;
- the number and outcome of supplier or labour-related audits undertaken;
- the level of completion of modern slavery and broader compliance training;
- the implementation and closure of corrective action plans where issues are identified; and
- the extent to which key suppliers and subcontractors meet RJ McLeod's contractual and policy expectations.

RJ McLeod recognises that assessing effectiveness in this area requires continuous development. We will continue to refine our measures over time to improve visibility, consistency and comparability.

Consultation with Group Reporting Entities

This Statement has been prepared by the Group's Risk & Compliance team, in consultation with The Company, and applicable Group functions and business leadership involved in operations, procurement, people management, legal and compliance, finance and project delivery. Consultation was undertaken to support a common understanding of modern slavery risk across the Group and to inform the content of this Statement.

Continuous Improvement and Future Priorities

The Company recognises that modern slavery risk management is an ongoing process and that expectations continue to evolve. During the next reporting period, we intend to continue strengthening our approach in the following areas:

- further enhancing supplier risk segmentation and supply chain mapping, including continued focus on higher-risk categories, jurisdictions and labour models;
- increasing the consistency and depth of supplier and labour-provider due diligence across the Company;
- continuing to strengthen workforce awareness through training, induction, toolbox talks and practical site-level communications;
- improving the use of measurable effectiveness indicators, including audit outcomes, supplier review coverage and training completion data;
- maintaining robust Speak Up and escalation mechanisms and reinforcing confidence in non-retaliation protections; and
- continuing to review and refine contractual controls, supplier standards and remediation pathways where concerns are identified.

RJ McLeod remains committed to continuous improvement in the prevention, identification and mitigation of modern slavery risks across its operations and supply chains.

Governance

This statement was approved by the RJ McLeod Board of Directors on 24th June 2026 and is available on <https://tiscreport.org/> and <https://modern-slavery-statement-registry.service.gov.uk/>.



R van Beek
Managing Director

Last Updated 16th September 2026