

Freyssinet Limited is a specialist engineering company engaged in the design, supply and installation of specialist products, systems, and services to the building and civil engineering industries. Aquaforce Concrete Services Limited is a wholly owned subsidiary of Freyssinet and specialist concrete subcontractor serving a range of industries including highways, rails, and utilities.

Freyssinet Limited's directors and management are committed to the highest standards of ethical conduct and integrity in the organisation's business activities in the UK and abroad.

This statement is published with the support of our Board of Directors and created with input from Procurement and Human Resources.

It applies to all company employees and temporary workers, consultants, contractors, and subsidiaries acting for or on behalf of the Company in the UK.

### Review and Access

Pursuant to Section 54 of the Modern Slavery Act 2015, this statement will be reviewed and updated annually to ensure that the company complies with its applicable legal obligations. It is available to anyone who wishes to obtain a copy through our website and can also be made available to interested parties upon written request.

It is management's responsibility to communicate the expected standards to our employees and ensure that they conduct themselves in an appropriate manner.

The Company will also ensure that its Modern Slavery Statement and related policies are effectively communicated to all employees, subcontractors and suppliers via our website, intranet, supply contracts and employment contracts.

The Company reserves the right to change and update its approach to modern slavery as necessary.

All relevant parties must ensure that they read, understand, and comply with this statement. Prevention, detection and reporting of modern slavery is the responsibility of our employees, our subcontractors, and our suppliers.

All stakeholders are required to avoid any activity which might suggest or lead to a breach of the Modern Slavery Act. Any such breach by an employee may result in disciplinary action and in the case of suppliers and subcontractors, may result in contract termination.

Anyone who suspects modern slavery is taking place, or has any suspicion, or is aware of any breaches should speak to a member of Human Resources in confidence or follow the Whistleblowing procedure which can be found on the Company intranet.

### Relevant Policies and Procedures

We are dedicated to ensuring there is transparency in our business and in our approach to combatting modern slavery in all our operations.

We expect the same high standards from all our subcontractors and suppliers.

Our organisation has several policies and procedures in place that protect our workers from unfair treatment and promote an inclusive workplace.

They clearly state how we operate and the steps we take to ensure we are a transparent and inclusive organisation. They are reviewed annually and updated to ensure ongoing opportunities for improvement are identified and implemented.

Our policies and procedures include:

- Disability policy
- Reasonable adjustments policy
- Diversity and Inclusion policy
- Equal Opportunities policy
- Harassment and Bullying policy
- Human Rights policy – we have assessed our practices and build an action plan with an assessment called Managing Human Rights from VINCI
- Whistleblowing procedure and policy
- Recruitment and selection procedure and policy – we are following Freyssinet's guide to valuing diversity and promoting inclusion.
- Wellbeing policy
- Right to work in the UK - managed by Human Resources, Freyssinet operates a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees and evidence of employees holding their own bank account to safeguard against human trafficking or individuals being forced to work against their will.

## Working hours

The Company respects national legislations on working hours and overtime, where they exist. The limitations on overtime are respected, even if an employee requests to work additional hours.

- Records of working hours per week are kept and monitored by the Company.
- Overtime hours are remunerated at an enhanced rate above normal working hours.
- Employees have a minimum of one rest day per week, except for specific types of work or situations, for which special rules on working hours and rest periods may apply in line with the UK working time regulations.
- Employees have access to restrooms and are allocated breaks during their workday.
- Rules on working hours and rest and break periods are communicated to workers in their contract of employment.

## Standards on accommodation

When our workforce is required to work / live away from home, the company will support their accommodation needs by providing either a property lease paid by the company or through a daily subsistence payment (in line with the CIJC working rules agreement) that enable them to select their own accommodation.

## Whistleblowing

Freyssinet believes that good communication between workers at all levels promotes better business practices. Irregularities committed by employees at any level will not be tolerated by the Company. If a worker has a concern, the matter can be reported without fear of retribution. As well as internal procedures for direct employees to highlight any concerns they may have, we also provide a confidential reporting service, which is available for employees, members of our supply chain and members of the general public. This is a service operated by an independent third party, and is available 24 hours per day, 7 days per week.

We also offer a confidential employee helpline, available to all employees, operated by an independent third party (Unum LifeWorks) and available 24 hours a day, 7 days a week. All

complaints received are treated seriously.

## Training and Awareness

Training is a fundamental way of raising awareness and ensuring that employees, subcontractors, and suppliers understand the importance of tackling modern slavery.

Mandatory e-learning modules are completed by all employees on Human Rights.

## Community Engagement and Social-impact assessments

Freyssinet is committed to delivering economic, social, and environmental value to the communities in which we operate. As part of this commitment, we recognize the importance of combating modern slavery in all its forms within our operations and supply chains.

Our social value commitment can be categorized into four themes:

- Inherent Social Value: Value created through the delivery of core services, such as the repair and construction of highways, structures, and buildings.
- Embedded Social Value: Value created as a company through employing and developing people while ensuring that all employment practices align with our ethical standards.
- Additional Social Value: Collaborating with clients and stakeholders to deliver value to communities, while actively working to prevent exploitation in our supply chains.
- Environmental Sustainability: Consistently seeking initiatives to minimize our environmental impact, ensuring that sustainability efforts also consider ethical sourcing and production.

Through these efforts, Freyssinet reaffirms its dedication to creating a socially responsible and ethically sound operating environment.

### Supply Chain

We are committed to working in partnership with our supply chain to combat modern slavery and human trafficking and to promote ethical and sustainable sourcing throughout our business and supply chain.

We expect our supply chain to ensure that procured products meet ethical standards and can provide full transparency.

To make this possible, Freyssinet agrees to:

- Check our contractors before entering our supply chain system.

Confirm that policies and processes are in place and if that they adhere to the Modern Slavery Act 2015. High risk tier one suppliers will be highlighted from the risk analysis, a strategy will then be formalised as to how and when auditing and further checks are carried out on these supply chain members.

### Moving Forward

We intend to take the following further steps to combat slavery and human trafficking:

- Provide training to relevant employees to understand and identify possible breaches of the Modern Slavery Act.
- Take appropriate action based on risk and severity.
- Incorporate anti-slavery and human trafficking obligations into procurement agreements and subcontracting arrangement.
- Conduct a comprehensive risk assessment to identify and evaluate potential modern slavery risks within our operations and supply chains, including a supply chain mapping and sector & country risk profiling.
- Conduct risk-based audits of suppliers where appropriate to ensure compliance with our ethical standards and the Modern Slavery Act 2015.

To enhance our commitment to ethical labour practices, Freyssinet Limited is embedding specific clauses into our standard Terms & Conditions and supplier contracts. These clauses prohibit the charging of recruitment fees to workers, mandate the provision of transparent pre-departure terms,

and ensure that workers' ID/passports are not retained by employers. The company is vehemently opposed to all forms of exploitation, fully supports the Modern Slavery Act, and is committed to ensuring that Human Trafficking and Slave Labour are not part of its supply chain.



**Stéphane Carayol**  
Managing Director

May 15<sup>th</sup>, 2026