

# Modern Slavery Transparency Statement 2024/2025

Robertson Group Limited

## Introduction

Robertson Group Limited (referred to herein after as Robertson) is one of the largest family-owned construction, infrastructure and support service businesses in the UK. Our purpose is to assure a sustainable future. It's why we are a climate positive company and have ambitious environmental and social targets for the benefit of our people, our partners and our planet.

Robertson and our businesses are committed to ensuring that we 'always do the right thing in the right way' is integral to our business and our decision making. The construction industry remains one of the high-risk sectors in the UK for modern slavery and we are working in collaboration with the wider industry and our supply chain partners to tackle this complicated issue.

Robertson are committed to playing our role in eradicating modern slavery in all its forms. We know that labour abuses, including modern slavery, are complex and have interdependencies with other risks, such as poor inclusion practices, bribery and corruption relating to business operations and supply chain. We are continually taking appropriate steps to ensure that everyone who works for Robertson benefits from a working environment in which their fundamental human rights are respected and we encourage everyone we do business with to also uphold this principle.

The information in this statement forms part of our strategy that leads the way as a socially responsible business that details the policies, processes and risk improvement actions we have taken to prevent modern slavery taking place in our supply chains or any part of Robertson.

## Our purpose

Robertson is committed to being a purpose-led organisation, that exists to 'assure a sustainable future' for all our stakeholders, it's what makes us stand out from the crowd. Our purpose guides our daily decision-making and provides certainty and assurance for:

- Our customers, the certainty that we will deliver what we say we will.
- Our people, the certainty of opportunity and progress, and knowing that their safety and welfare is paramount.
- The communities we operate in, the certainty that we will consult openly and work to build a positive legacy.
- Our suppliers and supply chain partners – by treating them fairly and encouraging them to deliver.
- Society - by acting as a responsible business.

## Our principles

Robertson strives to create better outcomes for all our stakeholders by living our principles:

- We listen.
- We are professional.
- We take responsibility.
- We are determined to succeed.
- We are one team.

We bring these principles to life through our day-to-day behaviors and by aspiring to put our purpose at the front and centre of everything we do. We ensure our employees are aware of the Act and the drivers of

Modern Slavery, as well as the potential risks. We share this statement with all employees through our internal communication channels and a copy of this statement is available on our website [www.robertson.co.uk](http://www.robertson.co.uk)

## Governance

We have a cross functional steering group through which we develop and coordinate our approach to addressing modern slavery risks within our operations and supply chain. The forum consists of expertise from the legal and compliance and procurement operational functions.

## Supply chain partners

Robertson is a UK based organisation, with over 3000 direct employees and a further 50,000 supply chain partners who can deliver services on any of our sites across the UK. Our reach is wide, spending circa £750 million each year with a supply chain, 96% of our direct spend is with UK registered companies. Maintaining a high calibre supply chain is crucial to for the reduction of risk and development of strategic relationships.

Robertson understands that procurement of goods and services from third parties carry with it the risk of modern slavery and human trafficking. We understand that a potential for risk of modern slavery sits within our supply chain due to the number of suppliers and supply chain partners we contract with, the people they employ and or our businesses engage with who are not our direct employees.

### Supply chain contracts

Our standard forms of procurement contract make explicit reference to the Act, as well as covering other areas of company information, policy and procedure. This enables the procurement team to assist Robertson to identify and assess any potential risks relating to the goods or services being procured. We carry out reasonable and practical due diligence in the sourcing of goods and services to ensure that modern slavery obligations form part of the procurement process. This includes ensuring that our supply chain:

1. Have taken steps to eradicate modern slavery within their business by completing a pre-qualification due diligence questionnaire
2. Hold their own supply chain to account over modern slavery; and
3. Pay their employees at least the national minimum wage / national living wage (as appropriate).

### Supply chain code of conduct

Our Supply Chain Code of Conduct sets out these requirements detailing the basic principles of how we will conduct business in an open, honest and transparent manner, and the behaviours and practices we expect of our supply chain, including a commitment to comply with the Act. Our supply chain partners are committed to meeting both legal and ethical standards in their daily operations, while ensuring that compliance is managed appropriately across their own supply chain partners.

### Supply chain partner compliance

Robertson are fully committed both internally and externally, through our supply chain, to ensuring that no business practice contravenes Section 54 and/or Clause 5 of the Act. Robertson will report to the police and take appropriate action to protect the victims of modern slavery and human trafficking and ultimately shall enforce its contractual rights should any instances of modern slavery or human trafficking come to light.

As a minimum, Robertson expect both ourselves and our supply chain to comply with all applicable laws and regulations providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically and using environmentally responsible practices where practicable.

### Supply chain sustainability school training

As partners of the Supply Chain Sustainability School, we continue to utilise industry-wide training resources for both our own employees and those of our supply chain. We actively promote engagement in events and briefing sessions which are held by the school along with promoting associated e-learning modules and working to develop learning pathways to ensure that awareness is maintained.

## Risk management - our commitment to continual improvement

As part of the UK government's guidance for business it is expected that year-on-year improvements are made. To support our commitment, during financial year 2023-2024 we continued our journey to eradicate modern slavery by introducing and implementing the following additional risk mitigation measures:

- Over 60% of our preferred supply chain have now joined the Supply Chain Sustainability School that provides guidance and support to members of the supply chain.
- We launched our Environmental, Social and Governance (ESG) programme to drive action on the materially important ESG issues that influence our performance and/or the impact we have on society and the environment.
- We enhanced our existing third-party risk methodology and management system by introducing a comprehensive risk-based approach to third-party risk management that is also complemented by a supply chain code of conduct that establishes the fundamental principles we expect our suppliers and related third parties to adhere to. These improvements support Robertson to consistently assess and manage risks associated with third parties that could have significant adverse environmental or social impacts and may expose Robertson to financial and/or reputational risks. The roll-out of this Robertson risk-based approach will continue during 2024 and 2025.
- We continue to mandate the completion of our annual desk top review for compliance with Modern Slavery requirements for all existing and new sub-contractors across Robertson.
- We have partnered with Constructionline to introduce a third-party Supply Chain approval process which utilises the Common Assessment Standard as our core onboarding requirement.
- Revised, updated and communicated our Modern Slavery Policy.
- Enhanced management control of agencies by introducing a list of preferred and vetted suppliers who are subject to our enhanced third-party risk management process.
- We have continued to reinforce our drive to improve both awareness and compliance across all areas of the supply chain through our annual supply chain conference and awareness events.

### Our focus during 2024-2025

Robertson are committed to continually reviewing and improving our approach to identifying and managing the risks associated with our supply chain. We have committed to undertaking the following improvement steps during the 2024-2025 financial year:

- Proactively developing learning pathways for both employees and supply chain partners to create further awareness to ensure awareness and understanding of the effects of Modern Slavery.
- Develop on-site controls through implementation of enhanced processes and procedures that support the ability to identify specific risks associated with modern slavery whilst providing a platform to support future improvements.
- Continue to enhance our programme of engagement with our supply chain, which identifies areas

of high risk, to increase our influence on activities throughout their supply chain.

- Utilise external resources to support both awareness of risk and development of controls to address modern slavery across all areas of our business and supply chain.
- Further develop our suite of policies to address modern slavery across our supply chain where required.
- Enhance our onboard induction process to further highlight the responsibility of all employees and supply chain in identifying signs of modern slavery and reporting any concerns.
- Host an awareness campaign in October each year for all employees and supply chain partners to raise the importance of the eradicating all forms of modern slavery.
- Increasing awareness among our employees and continue to ensure that they know how to identify the signs of modern slavery and understand how to report them.
- Assessing the effectiveness of our employee training and guidance measures in identifying and combatting modern slavery.

## Relevant policies

Robertson has in place policies and associated procedures to ensure that we are conducting our business in an ethical and transparent manner. These include:

- Modern Slavery Policy and Statement.
- Recruitment policy.
- Whistleblowing policy.
- Responsible procurement policy.
- Diversity, Inclusion and Equality policy.

Any breach of Robertson policy will be regarded as a serious matter and will result in appropriate action being taken.

## Board approval

This statement is made pursuant to Section 54(1) of the Modern Slavery Act (the "Act"), the Robertson Group Limited Board approved this statement on 30<sup>th</sup> September 2024. The statement will be reviewed and updated in September 2025.



Brian McQuade  
Chief Operating Officer  
Robertson Group Holdings Limited