

Modern Slavery and Human Trafficking Statement

Rev 6

HR-POL-035

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps that W M Donald has taken, and continues to take, to ensure that modern slavery and human trafficking are not taking place in our business or supply chains.

Modern slavery is a criminal offence and a violation of fundamental human rights. It encompasses slavery, servitude, forced or compulsory labour, and human trafficking. W M Donald has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business relationships, implementing effective systems and controls to mitigate the risk of modern slavery in our operations and supply chains.

We expect all employees, subcontractors, suppliers, and business partners to share and uphold these values.

This statement outlines the actions taken during the 2025/2026 financial year and the steps planned to further strengthen our approach.

Our Business

W M Donald is one of the largest civil engineering construction companies in the North-east of Scotland, and we work on projects across Scotland. W M Donald constructs roads, sewers, utility networks, bridges, building foundations and other structures. Our teams work collaboratively with clients and third parties to ensure that work is carried out efficiently, effectively and on time. With 250 employees, supported by 100 subcontractors and an extensive supply chain we must all play our part in upholding human rights and combatting modern slavery. This is why we must be vocal in our commitment to safeguarding the highest standards of ethical conduct across our business and beyond.

Our Supply Chain

We worked directly with over 80 product suppliers during 2025/26 financial year, of which 23 provide us with core materials including coated and uncoated quarry materials, precast concrete, reinforcement, insulation, and drainage products.

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Our supply chain plays a key part in helping us to deliver an efficient service and we depend on them to provide quality materials efficiently and from ethical sources. We spend over £35m annually with our supply chain of which 80% is with British owned companies.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The following policies and supporting guidance, are relevant to slavery and human trafficking, and are available on request:

- Anti-Slavery and Human Trafficking Policy (Updated 2025)
- Code of Conduct (Updated 2025)
- Whistleblowing Policy (Provides channels for raising concerns, updated 2026)
- Recruitment & Selection Procedure (Includes modern slavery considerations, updated 2025)
- Anti-Bribery Policy (updated 2025)
- Corporate Social Responsibility Policy (updated 2026)
- Grievance Procedure (updated 2025)

Our procurement contracts require suppliers to comply with the Modern Slavery Act 2015, in addition to other relevant WM Donald policies, including our Code of Conduct and Whistleblowing policy.

We also require our suppliers to:

- implement due diligence procedures for their own supply chains; and
- Use reasonable endeavours to ensure that raw materials, resources, and products are not sourced from organisations using forced or compulsory labour.

Due diligence processes for slavery and human trafficking

To identify, assess, and mitigate the risk of modern slavery, W M Donald has implemented the following measures:

- Robust recruitment processes, including verification of identity and right-to-work checks
- Accreditation as a Real Living Wage and Real Living Hours employer
- Supplier risk assessments and proportionate audits

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- Contractual obligations relating to ethical labour standards
- Confidential whistleblowing arrangements for employees and third parties

Risk Assessment and Management

We recognise that construction supply chains can present heightened risks, particularly where labour-intensive activities or raw materials are involved.

Our risk management approach includes:

- Annual supplier risk profiling
- Enhanced due diligence for higher-risk suppliers
- Targeted audits where potential risks are identified
- Ongoing monitoring of supplier performance and compliance

Supplier Adherence to Our Values and Ethics

We have zero tolerance for slavery and human trafficking. Our supplier compliance program includes:

- Updated Supplier Appraisal Form (2025 version with enhanced due diligence requirements)
- New Supplier Code of Conduct Agreement (To be implemented in 2025/2026)
- Annual Supplier Risk Assessment and Audit Programme

Non-compliance may result in corrective action, suspension, or termination of the supplier relationship.

Training and Awareness

We provide training to ensure employees understand the risks of modern slavery and how to report concerns.

During 2025/2026, we will:

- Roll out updated e-learning modules via Mentor, including practical case studies
- Deliver mandatory training for senior managers and procurement teams
- Run awareness campaigns across all operational sites

Effectiveness in Combating Slavery and Human Trafficking

We track the following key performance indicators (KPIs):

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- Reports and Investigations: No cases of modern slavery reported during 2024/2025
- Training Completion: 70% completion rate achieved in 2024/2025; target of 100% in 2025/2026
- Supplier Audits: 75% of identified high-risk suppliers audited in 2024/2025; target of 100% in 2025/2026

Key Actions 2025/2026

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Conducting a comprehensive supply chain audit
- Expanding due diligence requirements for new and existing suppliers
- Enhancing leadership-level training and engagement
- Improving reporting mechanisms to ensure concerns can be raised easily and confidentially

This statement refers to the financial year ending 31 March 2026.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes WM Donald's slavery and human trafficking statement for the financial year ending 31st March 2026. It was approved by the board on 1st April 2026.

Ewan Riddoch

Ewan Riddoch
 Managing Director
 1st April 2026.

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