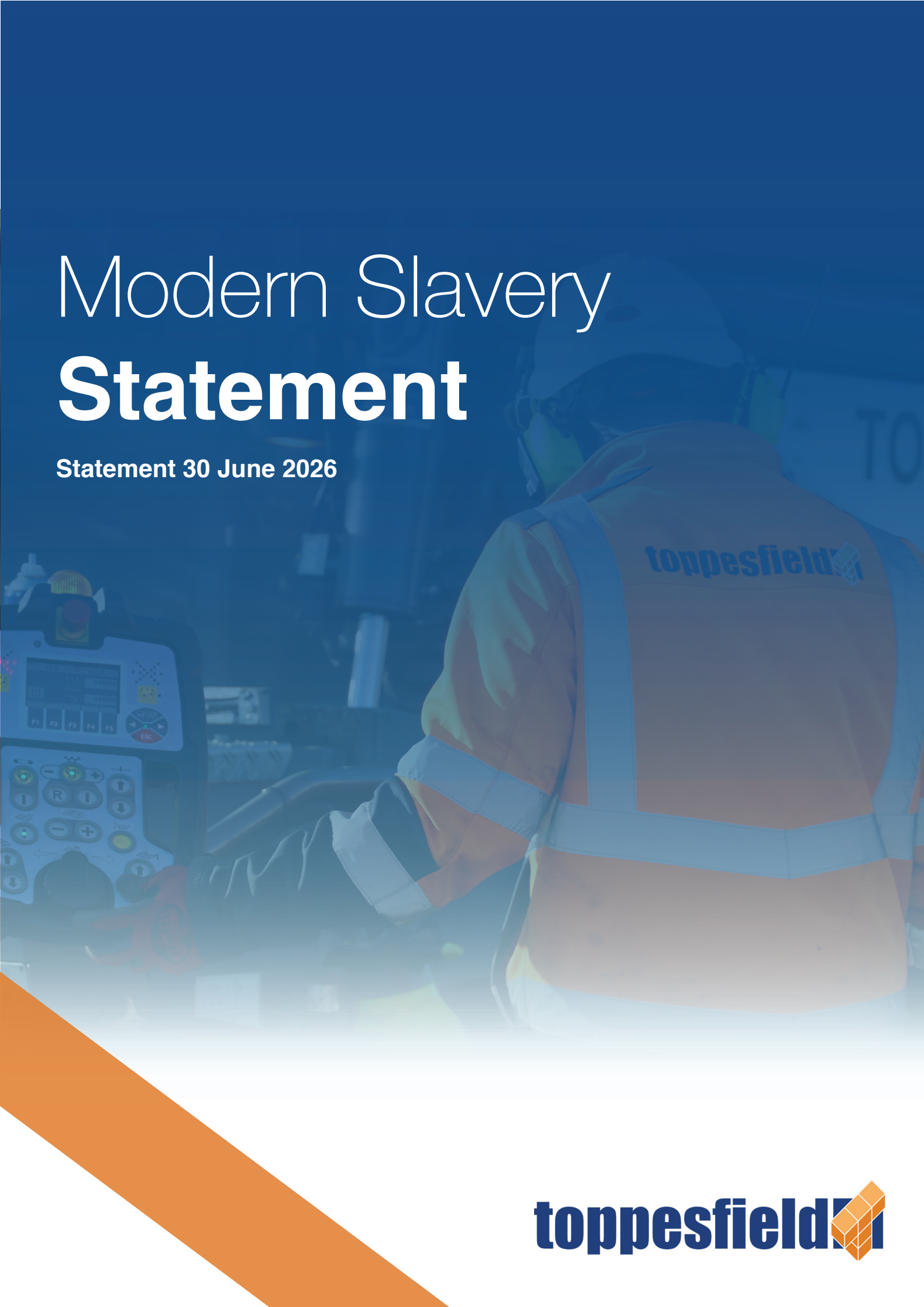


Modern Slavery Statement

Statement 30 June 2026



“

Toppesfield Limited is committed to conducting business ethically and responsibly.

We have zero tolerance for modern slavery, human trafficking, forced labour or exploitation within our business or supply chain.

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Bill Pryor
Managing Director, Toppesfield

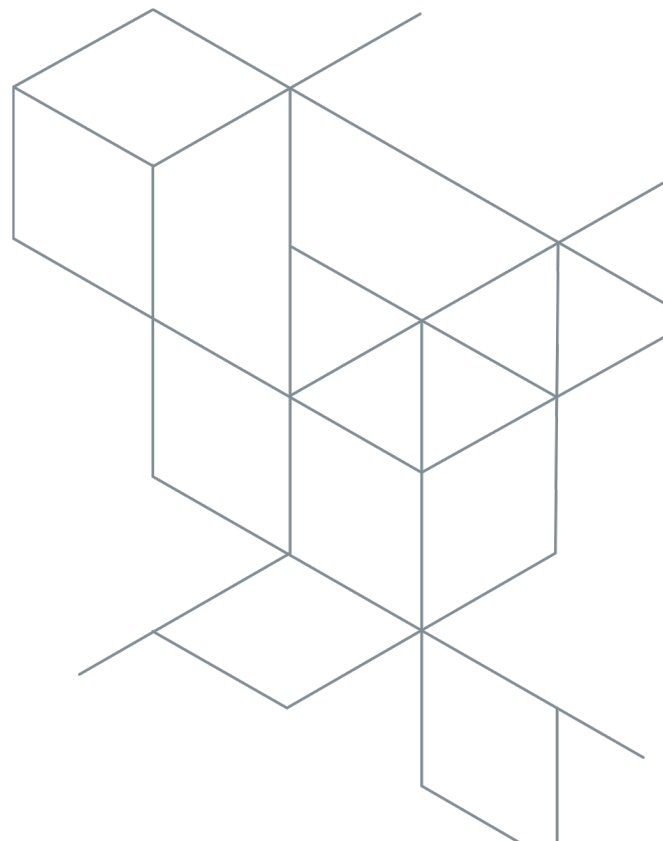


Introduction

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Toppesfield Limited's slavery and human trafficking statement for the financial year ending 31st December 2025.

At Toppesfield Limited, we are dedicated to upholding the highest ethical standards and implementing robust governance practices to ensure integrity and objectivity in all our business activities.

We are committed to maintaining robust processes, working with our employees, suppliers and subcontractors to fostering a culture of integrity, transparency, and accountability, which includes our ongoing efforts to prevent modern slavery and human trafficking in every aspect of our operations and supply chain.



Our Business

Founded in 2004, we have since grown into one of the UK's leading surfacing contractors, working with customers across a wide range of sectors to improve infrastructure, enhance safety, and create lasting value for communities.

Our services encompass production, surfacing, planing, reinforcement grids, anti-skid applications and lining for both the public and private sector. We take pride in delivering specialised, high-quality surfacing solutions tailored to the needs of our customers and their projects.

Whether we're supporting a major scheme on the highways network, delivering improvements to a community car park, or maintaining critical infrastructure that keeps society moving, our approach remains the same. We are transparent, responsive, and committed to putting the safety of our people, partners and the public first, every time.

Our turnover for the 9-month period to 31st December 2025 was £93 million.



Our Supply Chain

Toppesfield engages with a broad range of suppliers and subcontractors and other supply chain partners to support our operations, the majority of whom are based in the UK. We recognise that modern slavery and human trafficking can occur within complex supply chains and remain committed to identifying, assessing and addressing these risks.

We expect all suppliers and subcontractors to operate in accordance with our policies, applicable legislation and the high ethical standards we expect throughout our business. Those involved in procuring new suppliers and subcontractors are aware of the risks associated with modern slavery and human trafficking. Our Framework Agreement includes specific anti-slavery and human trafficking provisions, requiring suppliers and subcontractors to comply with all applicable laws and regulations. Where appropriate, these provisions also provide us with the right to request information, review relevant records and audit a supplier's policies and processes to ensure compliance.

We aim to build open, transparent and collaborative relationships with our supply chain partners. We work with suppliers and subcontractors to promote awareness, strengthen controls and reduce the risk of modern slavery and human trafficking within our supply chain.

Suppliers and subcontractors identified as higher risk are subject to regular review meetings.

Through this collaborative approach, we seek to reduce risk, influence positive behaviours and continually strengthen our approach to preventing modern slavery and human trafficking across our supply chain. We are committed to maintaining robust processes, working with our supply chain partners to identify and address any risks, and continually improving our practices to ensure that human rights are respected throughout our operations and supply chain.





Our Policies

We are committed to maintaining the highest standards of ethical behaviour and have a zero-tolerance approach to modern slavery.

We recognise that modern slavery risks can occur within complex supply chains and, as a construction business, we understand the importance of managing these risks where we engage suppliers, subcontractors, labour providers and other third parties. Our Modern Slavery Policy sets out our expectations for all current and prospective suppliers, subcontractors and business partners and reinforces our commitment to ensuring that those working within our supply chain operate responsibly and in accordance with applicable legislation.

We regularly review our Modern Slavery Policy and our approach to managing these risks across our own business and supply chain. Those involved in procurement and the management of contracts involving subcontracted labour are expected to consider modern slavery risks when selecting and managing suppliers and subcontractors.

We provide appropriate training and awareness to employees to help them understand what modern slavery is, recognise potential indicators of exploitation and

understand their responsibility to prevent, identify and report concerns. Our expectations regarding ethical conduct and integrity are communicated to employees as part of their induction and ongoing employment, with employees expected to act responsibly in their dealings with colleagues, suppliers and subcontractors.

We are committed to providing employees and members of our supply chain with a safe and confidential mechanism to raise concerns or report suspected breaches of our standards. Our Whistleblowing Policy provides a mechanism for employees and others to raise concerns regarding suspected modern slavery, human trafficking or other unethical practices without fear of retaliation. Concerns raised will be taken seriously and investigated appropriately.

Where a supplier, subcontractor or other business partner is found to have breached our Modern Slavery Policy or failed to meet our expected standards, Toppesfield will take appropriate action. This may include requiring corrective action, undertaking further investigation or, where appropriate, terminating our relationship with the organisation concerned.

Due Diligence & Risk Assessment

To uphold our commitment to taking reasonable and proportionate steps to identify, assess and manage the risks of modern slavery and human trafficking within our business and supply chain. Our approach includes the following:

- Modern slavery risks are considered as part of the due diligence and pre-qualification process when appointing new suppliers, subcontractors and labour providers.
- Our expectations regarding modern slavery, forced labour, human trafficking and ethical employment practices are communicated to suppliers and subcontractors as part of our engagement with them.
- We assess potential risks associated with the nature of the work, the use of subcontracted or agency labour, the location of operations and the nature of the supply chain when considering suppliers and subcontractors.
- We expect suppliers and subcontractors to comply with applicable legislation and to maintain appropriate employment practices, including ensuring that workers are lawfully employed, paid appropriately and treated with dignity and respect
- Those involved in procurement and contract management are expected to remain alert to potential indicators of modern slavery or worker exploitation and to raise any concerns through the appropriate channels.
- Where concerns or potential risks are identified, Toppesfield will take appropriate steps to investigate and understand the circumstances and, where necessary, require corrective action or further assurances from the supplier or subcontractor.
- We will monitor and review our approach to modern slavery and consider any identified risks, concerns or changes within our supply chain to ensure that appropriate controls remain in place.
- Where a supplier, subcontractor or other business partner is unable or unwilling to meet our standards or address identified concerns, Toppesfield may take further action, including suspension or termination of the business relationship and removal from our approved supply chain.

Through our due diligence and risk assessment processes, we aim to ensure that modern slavery risks are appropriately considered throughout the lifecycle of our relationships with suppliers, subcontractors and other business partners.

In 2025, Toppesfield underwent an independent Ethical Employment Audit conducted by Achilles. The audit reviewed our employment practices and approach to ethical employment, with no non-conformities identified.



Training & Awareness

Modern slavery training is a mandatory requirement for all our employees. In 2025, we introduced a bespoke Modern Slavery eLearning module through our learning platform, supported by Modern Slavery Toolbox Talks. This combination of eLearning and Toolbox Talks ensures that information is accessible and relevant to employees across our business, including those working in operational roles.

Modern slavery training is completed every three years. Where significant changes are made to legislation, our business or our identified modern slavery risks, additional training or communications will be provided as appropriate. Training materials are reviewed annually and updated where necessary to ensure they remain accurate and reflect current legislation and good practice. Where material changes are made, these will be communicated to employees, and any updated training will be completed as required.

Modern slavery awareness materials and posters are displayed at our depots to maintain awareness of the risks of modern slavery and human trafficking, and to provide employees with information on how concerns can be raised.

Employees are encouraged to raise any concerns or suspicions regarding modern slavery or human trafficking and concerns raised directly with HR will be investigated by the team or HR will support the relevant investigation to ensure that concerns are addressed promptly, appropriately and confidentially, in accordance with our internal procedures.

ToppTraining 
Be inspired. Feel empowered. Grow together.





Monitoring our Effectiveness

We recognise that the construction sector is particularly vulnerable to risks associated with modern slavery, and we remain committed to preventing modern slavery and human trafficking.

- We undertake a review of modern slavery risks across the business including our procurement and supply chain processes.
- We continually assess potential modern slavery risks within our supply chain and apply appropriate risk assessment procedures when appointing new suppliers and subcontractors.
- We monitor completion rates for our modern slavery training and use assessments and feedback to evaluate its effectiveness.
- We monitor safeguarding, whistleblowing and other relevant reports to identify potential concerns relating to modern slavery, human trafficking or labour exploitation.

- We continue to promote our confidential Speak Out facility to employees and supply chain partners, ensuring individuals have an appropriate mechanism through which concerns can be raised.
- Our policies, procedures and controls are reviewed periodically to ensure they remain appropriate, effective and aligned with legislative requirements, recognised guidance and emerging risks.

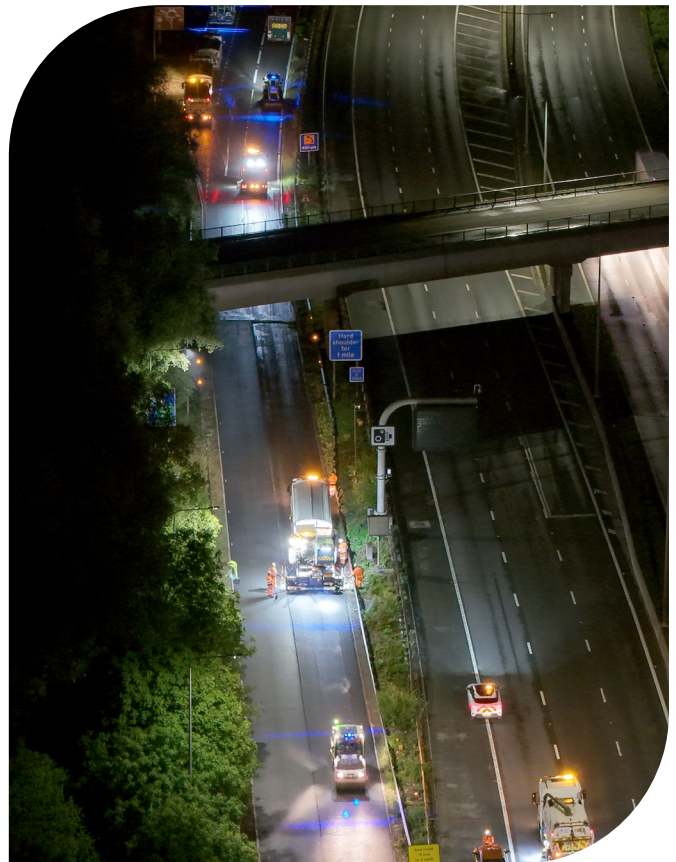
Through these measures, we seek not only to demonstrate compliance, but to continually assess whether our policies and controls are delivering outcomes in preventing modern slavery and human trafficking and to take further action wherever improvement is identified.

Our Journey

As part of our continued commitment to compliance with the Modern Slavery Act 2015, Toppesfield will continue to review and strengthen its policies, procedures and controls throughout the year.

We commit to:

- Strengthen our supply chain due diligence and monitoring, with particular focus on higher-risk suppliers and subcontractors.
- Review the effectiveness of our training through completion data, feedback and engagement with employees.
- Continue to promote our reporting and whistleblowing arrangements, ensuring employees and supply chain partners know how to raise concerns.
- Continue to improve our modern slavery awareness across the business including awareness training for senior managers and supply chain team.



Approval

This statement has been approved by the Board of Toppesfield Limited and is signed on its behalf.

Our statement will be reviewed and published annually.

A handwritten signature in black ink, appearing to read 'Bill Pryor', with a stylized, flowing script.

Bill Pryor
Managing Director
Date: 30th June 2026

Version History

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Revision	Date	Author	Checked by	Approved by
1	30/06/2026	Chantelle Woodward	Mark Salmon	Bill Pryor

Distribution Record

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