CONWAY
great people : great work

fmconway.co.uk

STATEMENT 30 JUNE 2026

MODERN SLAVERY

PEOPLE FIRST
GO HOME SAFE

Slavery is closer than you think.

You could save someone from slavery just by spotting the signs and reporting your concerns.

Contents

4 Introduction

5 Our Business

6 Our Supply Chain

8 Our Policies

9 Due Diligence and Risk Assessment Processes

10 Modern Slavery Training and Staff Awareness

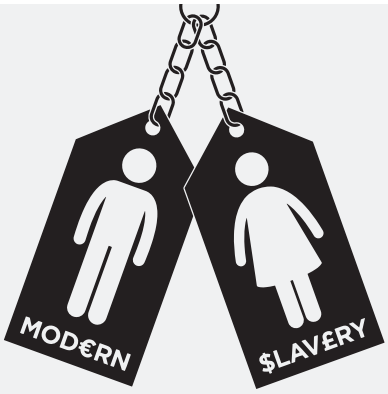
12 Public Awareness

13 Monitoring our Effectiveness

14 Our Journey

15 Approval

INTRODUCTION



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

It constitutes FM Conway's slavery and human trafficking statement for the financial year ended 31 December 2025. It covers the activities of FM Conway.

We are committed to achieving the highest level of ethical standards and implementing sound governance arrangements to ensure integrity and objectivity in our business activity.

We embrace the principles of fairness, inclusion, and respect in everything we do and strive to ensure transparency throughout our business.

Scan QR code to anonymously use our reporting app

IF YOU HAVE ANY CONCERNS, USE OUR SPEAKOUT APP

OUR BUSINESS

FM Conway is a leading infrastructure services company delivering vital services in transportation, the built environment and open spaces for communities and business.

We undertake our services through our self- delivery model, and combine our in-house Consultancy team with frontline operational excellence, to ensure we inspect, design, build, enhance, and maintain essential infrastructure services for the community.

The FM Conway Group's turnover **(including its subsidiaries)** for the year ending 31 December 2025 was £609.7 million. The company employed 2,019 employees as of 31 December 2025.

OUR SUPPLY CHAIN

FM Conway uses a wide range of suppliers who supply goods for sale and/or who provide services to our business and our customers.

We use approximately 1,500 unique suppliers in each calendar year. We continue to target our direct spend in low-risk environments and in 2025, 0.1% of our direct total external spend was with suppliers in high-risk countries of origin (countries being determined as high risk by the Global Slavery Index).

All new agreements with companies providing subcontracted labour to FM Conway include an anti-slavery provision, including the right to audit a vendor's books and processes to ensure the vendor is compliant with all relevant laws and regulations.

Our purchase order terms and conditions include an anti-slavery clause, and it is company policy to have a purchase order in place prior to commencing any work.

We have regular review meetings with suppliers identified as higher risk **(through our risk assessments)**.

OUR POLICIES

Our Modern Slavery Policy reflects our position of zero tolerance of modern slavery and human trafficking in any form, and reinforces our commitment to acting ethically and with integrity in all our business relationships.

This year, we have reviewed our Modern Slavery Policy to ensure compliance for our own business and all our suppliers. We may terminate our relationship with suppliers and other business partners if they breach this policy.

We have a Supplier and Contractor Code of Conduct which sets out our specific expectations for all current and prospective suppliers and subcontractors, to reinforce the company's commitment to be free from forced, bonded or compulsory adult or child labour throughout our supply chain. We have embedded our comprehensive modern slavery training for anyone involved in procurement or in the management of contracts that use subcontracted labour.

We regularly brief our workforce in respect to the company's Code of Conduct which requires them to act with integrity in all their dealings with either their colleagues or suppliers. A full explanation of this Code of Conduct is carried out with all new employees.

Our Ethical and Sustainable Procurement Code sets out our standards with respect to buying goods and services; as well as detailing requirements with respect to human rights, child and forced labour, and modern slavery. This forms part of our contractual relationship with our suppliers.

We are committed to achieving the highest level of ethical standards and strive to ensure integrity and objectivity in our business activity. It is the company's responsibility to provide employees and members of our supply chain with a safe and confidential mechanism to raise concerns and report breaches of our standards, processes, or protocols. Our Whistleblowing Policy provides a mechanism for our employees to report any concerns or suspected breaches of our policies.

Our Speak Out helpline and app enables employees and others to raise any concern or to seek advice on a matter related to compliance with the law, our published business ethics, and our company Code of Conduct directly with the business. Our helpline is for all employees and for third parties with whom the company has a business relationship **(including employees, contractors, customers, suppliers, and agents)**, if they observe wrongdoing or wish to raise concerns.

DUE DILIGENCE AND RISK ASSESSMENT PROCESSES

We carry out detailed due diligence checks on our supply chain, which includes reviewing for risks of modern slavery and human trafficking.

We have systems to identify and assess any area of potential risk of transgression of our business ethics in our own company and our supply chains, and to protect whistle blowers.

Our Internal Audit department annually reviews our approach to compliance with the Modern Slavery Act 2015 and to date, this testing has not highlighted any red flags that indicate modern slavery is present in our workforce or supply chain.

Our annual audit has concluded that the controls evaluated that demonstrate compliance with the Modern Slavery Act were deemed adequate and appropriate to provide assurance that risks are being managed. Our Internal Audit team carries out a quarterly evaluation of subcontractor invoices and this includes a review of modern slavery risks during their review and testing.

Should any future audit elicit evidence of non-compliance with the standards we have established, we support our suppliers to achieve improvement and adherence to our Key Performance Indicators (KPIs); in some cases, we accept that this may not be possible, and our business relationship may need to be brought to an end and the organisation be removed from our approved supplier list.

To safeguard the welfare of our directly employed and subcontractor workforce, we take steps to ensure that any potentially suspicious or concerning matters that come to light are fully investigated - for example, workers requesting payment of their wages into a bank account that is not their own, or multiple workers living at the same address.

MODERN SLAVERY TRAINING AND STAFF AWARENESS

SPEAK OUT

All employees complete Modern Slavery Training during induction and are expected to retrain on a three year cycle, with updates or refresher communications scheduled in between.

Training materials are reviewed annually and updated where necessary to reflect legislative changes. Significant updates are communicated to all employees.

While full retraining takes place every three years, employees must complete any updated version of the training which is released during that period to remain compliant. Completion rates are systematically monitored and reported as part of our mandatory training metrics.

An e-learning module is available to all, and Toolbox Talks are delivered to frontline staff to ensure that training reaches anyone without the equipment or ability to participate electronically. During the financial year ending December 2025, 96% of our employees had recompleted the modern slavery training module.

Our fixed sites and mobile welfare units display visual materials highlighting the 'Signs to Spot' for modern slavery to raise awareness and promote how workers can report any concerns via our company Speak Out helpline.

These materials are translated into the most commonly spoken languages across our workforce (Romanian, Polish, Albanian, and Lithuanian) to ensure key information on modern slavery is accessible to non-English speaking colleagues.

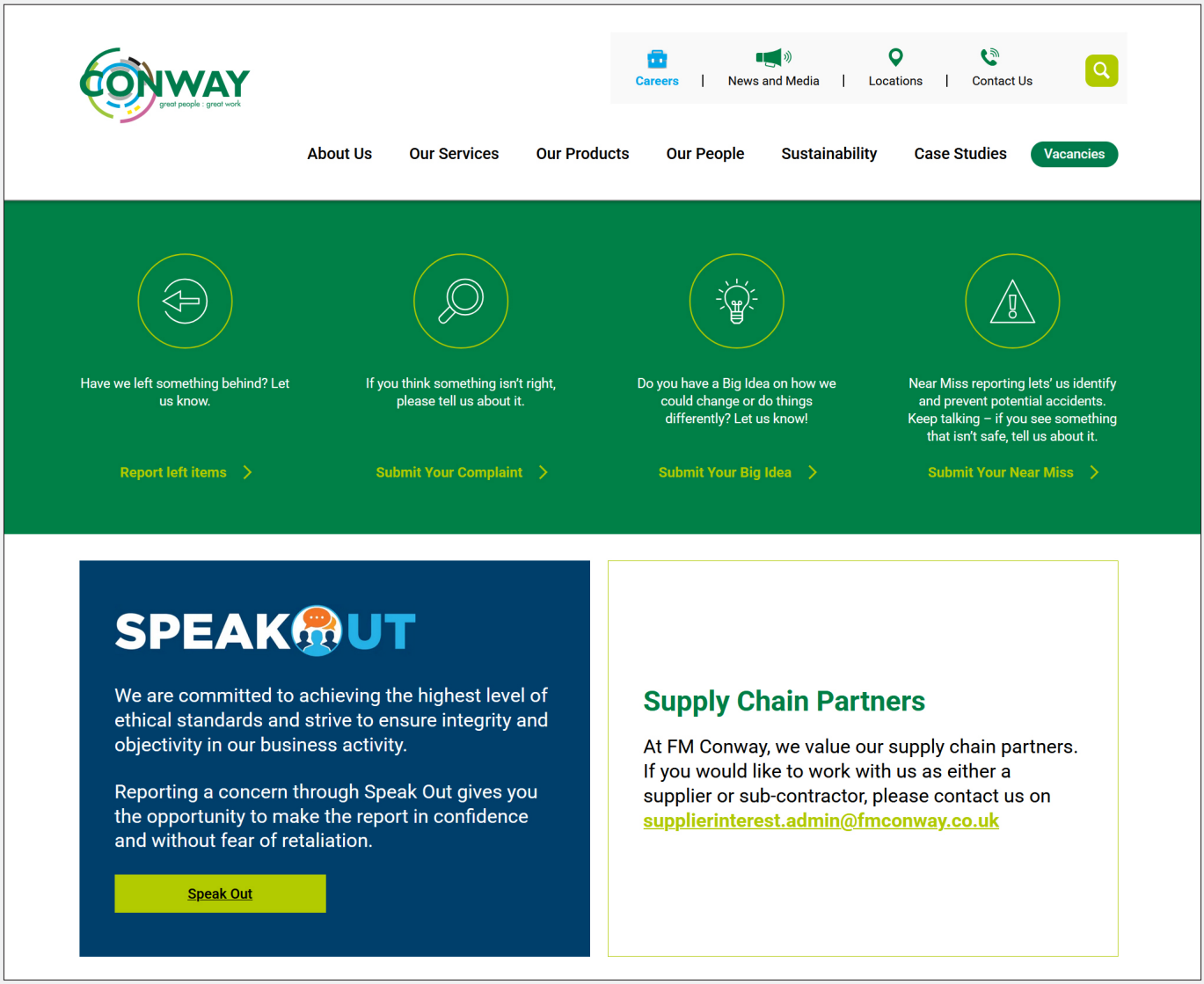
We have three alternative methods by which employees are able to raise any potential queries or suspicions if they feel Speak Out is not the best medium. Our SHEQ department will investigate concerns that are flagged to them via either the Near Miss reporting or Non-Conformance Reporting procedures.

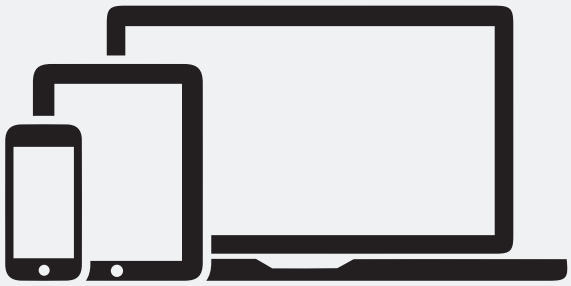
Our Human Resources team will also deal with any matters raised directly with themselves and/or support investigation where required.

PEOPLE FIRST
GO HOME SAFE

Scan QR code for an overview of the Modern Slavery Act:

PUBLIC AWARENESS





www.fmconway.co.uk/contact-us

We encourage feedback from our clients, partners, supply chain and communities and have a range of communication channels available for them.

Speak Out, Near Miss and Big Idea are apps by which individuals can report something that isn't right.

Our website has a 'contact us' page, where the apps can be accessed and where users can also get in touch via phone, email or an enquiry form.

MONITORING OUR EFFECTIVENESS IN COMBATTING SLAVERY AND HUMAN TRAFFICKING

MONITORING & WORKFORCE ENGAGEMENT

Number of home address checks identified as needed	100%
Number of home addresses investigated	Nil
Number of modern slavery incidents/concerns identified	Nil
Site visits conducted to raise awareness of modern slavery and reporting mechanisms	67

POLICY REVIEW & AUDIT

Modern Slavery Policy reviewed and updated for the forthcoming year	Yes
Internal Audit Completed	Yes
Annual risk assessment conducted	Yes
Number of 'red' actions identified	Nil

We are a signatory to the Gangmasters & Labour Abuse Authority Construction Protocol.

As part of our ongoing commitment to combatting modern slavery, child labour and human trafficking, our Internal Audit department complete an annual audit of modern slavery and consider modern slavery (including a review of our procurement processes) across the organisation; this audit serves to highlight any potential risks and mitigate actions concerning modern slavery.

Our KPIs enable our Internal Audit team to evaluate the effectiveness of these actions.

Our Security team continues to promote awareness of our Speak Out facility, a confidential helpline available to all staff and supply chain partners. This year, our focus was on face-to-face engagement with our workforce on site to help everyone recognise the signs of modern slavery.

As part of our training programmes, we offer learning and awareness to our employees and to our supply chain. We raise awareness through visual reminders, manager briefings, and internal communications.

OUR JOURNEY

We understand that the risk of modern slavery and human trafficking is ever present and will continually adapt and alter.

We continue to review our risks and instigate and monitor actions to mitigate such risks. We also commit to keeping abreast to any emergent industry wide risks and will monitor the landscape of modern slavery as it changes.

As part of our continued commitment to improving compliance with the Modern Slavery Act 2015 we continue to review our policies and hold regular modern slavery working group to ensure that we do so. This working group also ensures that we monitor our practices, supply chain activities, and improve our staff training and awareness programmes.

Actions that we commit to this year:

- Continue to deploy our modern slavery awareness programme
- Run an awareness campaign to include interactive elements to the programme
- Continue to roll out our modern slavery training provision for procurement professionals and contract managers

APPROVAL

THIS STATEMENT HAS BEEN APPROVED BY THE BOARD OF FM CONWAY AND IS SIGNED ON ITS BEHALF.

Andrew Hansen
CEO

29/06/2026

1 Subsidiaries: F.M. Conway Building and Maintenance Limited; Hawbury Cleansing Limited; The London Paving Company Limited; Heathrow Asphalt Limited; Berkshire Macadams Limited; Hampshire Macadams Limited; United Construction Materials Limited; United Asphalt Limited; United Asphalt (Theale) Limited; United Asphalt (Croydon) Limited; United Asphalt Contracting Limited; United Concrete Limited; 4 Vector Limited; Toppesfield Limited - *(separate Modern Slavery Statement completed).*

FM Conway

Conway House, Vestry Road, Sevenoaks, Kent TN14 5EL

01732 600 700 | **www.fmconway.co.uk**