MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Clegg Group Limited's slavery and human trafficking statement for the financial year ending 2026.

The Directors of Clegg Group Ltd (Clegg Construction Ltd, Clegg Food Projects Ltd) are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business and will take a zero-tolerance approach to any modern slavery or human trafficking. Our approach to achieving this aim 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 modern slavery and human trafficking is not taking place anywhere in our supply chains.

The construction sector can carry particular risks due to the use of subcontracted labour, labour providers, agency labour, lower-tier supply chains and complex material supply routes. This statement sets out the steps Clegg Group Limited has taken, and will continue to take, to identify, prevent and mitigate the risk of modern slavery and human trafficking in our business and supply chains.

Our Business and Supply Chains

Clegg Group Limited operates through Clegg Construction Ltd and Clegg Food Projects Ltd. Our business activities include construction, project delivery and associated services. Our supply chain is a crucial component of our business model. Responsibility for compliance with this statement sits with the Board of Directors.

Our Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk:

- Our sites and working environments will be managed by Clegg employed personnel to ensure optimum control of the work environment and who works within it.

- Where practicable we will continue to build long-standing relationships with contractors and suppliers and make clear our expectations of business behaviour.

- With regards to national or international supply chains, our point of contact is preferably with a UK company or supplier and we expect these entities to have suitable anti-slavery and human trafficking policies and processes in place. We expect each entity to adopt 'one-up' due diligence on the next link in the chain as a minimum requirement. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links within the supply chain.

- We have in place systems to encourage the reporting of concerns and the protection of whistleblowers.

- We monitor ethical standards across the business on a regular basis both internally and via external third-party audits. Sites undergo unannounced Inspections by our own HSEQ Department and external health and safety consultants. Both organisations will report back on any issues relating to social and human behaviour common with slavery and human trafficking.

To strengthen this approach, we will continue to review how modern slavery risks are investigated and assessed within our supply chain. This will include considering the level of risk associated with subcontracted labour, labour providers, lower-tier subcontracting, high labour-content packages and material supply chains.

Key Risk Areas

Clegg Group Limited considers the risk of modern slavery within its directly employed workforce to be lower due to our recruitment procedures, right-to-work checks, direct employment controls and management arrangements.

However, we recognise that there are areas within our wider supply chain and project delivery model which may carry increased risk. These include subcontracted labour, agency or temporary labour, labour-only subcontracting, lower-tier subcontracting, cleaning, security and welfare services, high labour-content packages, material supply chains where goods may be sourced internationally, and any arrangements where workers could be subject to recruitment fees, unfair deductions, withholding of wages or debt bondage.

We will continue to review modern slavery risks across our business and supply chain and will prioritise action where the likelihood or potential impact of modern slavery is highest.

Labour Providers, Subcontractor Labour and Debt Bondage Controls

As a company we use Labour Providers and contractors to supply a large percentage of our workforce. It is the responsibility of each Labour Provider and contractor to conduct the appropriate right to work checks before employment begins for any workers they use to carry out work on our sites.

In addition to right-to-work checks, we expect labour providers, subcontractors and relevant suppliers to ensure that workers are not placed at risk of debt bondage or labour exploitation. This includes ensuring that workers are not charged recruitment fees or unlawful fees to obtain work, are paid lawfully, directly and on time, are not subject to unfair or unexplained deductions, retain possession and control of their own identity documents, and are not forced to use specific accommodation, transport or banking arrangements as a condition of work.

We will review how these expectations are captured within supplier onboarding, labour provider checks, subcontractor engagement and site monitoring processes. Where appropriate, we will introduce additional questions or checks to confirm that labour providers and subcontractors have suitable controls in place.

Our Expectations of our Employees

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. All employees are required to avoid any activity that might lead to a breach of this policy.

If any member of staff believes or suspects a breach of, or conflict with, this policy has occurred or may occur, you must notify the Director responsible for your business function. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act or the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, you should raise it with your relevant Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Clegg Group Limited is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Internal Policies and Procedures

Across Clegg Group the following internal policies are operated to ensure that business is conducted in an ethical and transparent manner:

1. Right to Work Checks - Eligibility checks for the right to work in the UK are conducted for all employees prior to them commencing work, to safeguard against modern slavery and individuals being forced to work against their will.
2. Our Right to Work Checks will also ensure that no-one under the age of 16 is employed by the Company in any capacity.
3. Where appropriate, employees working on our sites will have the appropriate CSCS certification level for their on-site activity, which includes photo identification and evidence that the appropriate tests/qualification have been obtained in order to obtain a CSCS card.
4. A whistleblowing policy is in place so that all employees know that they can raise concerns about practices within our business or supply chain, without fear of reprisals.

These procedures are supported by other relevant company policies and processes, including health and safety procedures, recruitment and employment policies, supply chain approval processes, site induction and access controls, disciplinary procedures, and corporate responsibility procedures.

Contractor and Supplier Adherence to our Values

We expect all those in our supply chain and contractors to comply with our values. The supply chain security and integrity are a crucial component of our business model. Robust technical and traceability systems ensure that our contractors and suppliers are responsibly sourced from Organisations / Suppliers whose values are aligned with our own. As a company we use Labour Providers and contractors to supply a large percentage of our workforce. It is the responsibility of each Labour Provider and contractor to conduct the appropriate right to work checks before employment begins for any workers they use to carry out work on our sites.

We expect our contractors, suppliers and labour providers to take reasonable steps to ensure that modern slavery and human trafficking is not taking place in their own businesses or supply chains. We also expect them to cooperate with reasonable requests for information, assurance or corrective action where concerns are identified.

Training, Collaboration and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff, so that they know

how to identify exploitation and modern slavery and how to report suspected cases. All Directors have been briefed on the subject.

We will continue to review training requirements for key roles. Modern slavery awareness is included within site induction and training materials so that workers know how to identify warning signs and report concerns.

Preventing modern slavery requires collaboration across clients, contractors, suppliers, industry bodies, public authorities and specialist organisations. We strengthen our engagement in relation to modern slavery prevention through utilising industry resources, client or framework-led initiatives, supplier awareness activity and learning from other contractors, clients and public sector bodies.

Key Performance Indicators

Clegg Group Limited will monitor progress against the following key performance indicators. These will be reviewed annually and refined as reporting data improves.

REF	Detail	KPI
MS/KPI/01	Training and awareness for relevant employees	100% of relevant employees to complete modern slavery training or awareness briefing annually
MS/KPI/02	Site induction and worker awareness	100% of active sites to include modern slavery awareness and reporting routes within site induction material
MS/KPI/03	Supply chain prequalification and due diligence	100% of new subcontractors, suppliers and labour providers to complete relevant prequalification checks before appointment
MS/KPI/04	High-risk supply chain review	High-risk packages, suppliers or labour arrangements to be reviewed annually, with enhanced checks undertaken where required
MS/KPI/05	External engagement and collaboration	At least one external modern slavery training session, industry resource, client/framework initiative or collaboration activity to be undertaken annually

Objectives for the Next Reporting Period

1. Review and update the Modern Slavery and Human Trafficking Policy
2. Review site induction and toolbox talk content to ensure reporting routes and warning signs are covered
3. Develop a clear internal escalation process for suspected modern slavery concerns
4. Consider external collaboration or use of specialist modern slavery resources

Breach of the Policy

Any employee who breaches this policy will face formal or disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery or human trafficking.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

Signed on behalf of Clegg Group Limited Date 01st August 2026

Keith Anderson	Stephen Giltrap	Michael Sims
Group Commercial & Financial Director	Group Director	Group Director

This statement has been approved by the Board of Directors of Clegg Group Limited and will be reviewed annually.

This statement will be published on the Clegg Group Limited website.