



Issue No.	Date	Amendments
1	March 2017	Initial issue (non-mandatory due to turnover criteria)
2	February 2019	Policy, statement and procedures developed following increase in turnover
3	February 2022	Policy updated following Covid year when turnover dropped below reporting levels
4	November 2022	Statement revised following financial year 2021/2022
5	October 2023	Reviewed and revised following financial year 2022/2023
6	September 2024	Reviewed and revised following financial year 2023/2024

Modern Slavery and Human Trafficking Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015. It sets out the Centura Group's actions to understand potential modern slavery risks related to its business and to put in place steps aimed at minimising this risk. This mandatory statement issued by Centura relates to business dealings during the **financial year 1st July 2023 to 30th June 2024**.

Company Structure and Supply Chains

The Centura Group comprises the following companies:

CRL was founded in 1954 as a specialist contracting company and accounts for roughly 85% of the value of the Group. Over the past 68 years the business has maintained this specialist classification providing a comprehensive asset management and maintenance service to various private and public clients. CRL operates in various sectors, including highways, marine, water, heritage, car parks, building and rail.

CRL Surveys undertakes condition surveys and reports of existing concrete structures.

Equilux undertakes Electrical installation and maintenance. *[Left the Centura Group April 2024]*

F J Samuely and Partners is a structural Consulting Engineer.

Lifespan Structures designs, manufactures and supplies FRP composite bridge decks.

As part of the specialist construction industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking risks. The Centura Group is absolutely committed to preventing slavery and human trafficking in its corporate activities and its supply chain.

Countries of Operation and Supply

Centura's workload is almost entirely within the United Kingdom, other than the Australian branch of CRL.

Risk Assessment of Current Activities

The following activities are considered medium risk of slavery or human trafficking:

- The use of agency workers for labour intensive activities.
- Subcontractor packages with high labour content, especially where overseas operatives may be used – this tends to be most relevant to CRL's operations.
- The source of raw materials for the products we use, where materials are obtained and what the slavery and human trafficking situation is in these areas/companies. Potential higher risk materials identified are anodes that require specific metals for manufacture and are often imported from around the world.

Responsibility

Responsibility for the Company's anti-slavery and anti-human trafficking initiatives is as follows:

- **Policies:** The Board of Directors is responsible for putting these policies and procedures in place. In order to do so, the Board will rely upon Directors and Senior Management to review company processes and in its supply chains.
- The Board of Directors is responsible for reviewing this policy annually.
- **Risk Assessments:** The responsibility for human rights and modern slavery risk analysis lies with the Directors and Senior Managers within the company.
- **Training:** Awareness and employee responsibilities training will be organised by the Training Manager.



Relevant Policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations. These documents are held in the Centura Document Library:

- **Modern Slavery and Human Trafficking Policy**
- **Whistleblowing Policy**
- **Recruitment and Selection Procedure**
- **Dignity at Work Policy**
- **Equality & Diversity Policies**
- Various other written employment practices and procedures which ensure fair recruitment and treatment of employees.

Directors and Senior Management will revisit and develop these policies and procedures during the year and initiate any necessary revisions.

Due Diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence and risk management measures include:

- Consider the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- Request information from our supply chain in relation to their modern slavery and human trafficking policies and procedures.
- Use of Constructionline to check member information, and Credit Checks when required.
- Employee awareness of modern slavery and human trafficking.
- Supply chain awareness of modern slavery and human trafficking.

In the last financial year we have undertaken a full review of our supply chain approval process, including developing a bespoke in-house management system, and aligned our Supplier Questionnaire with the Common Assessment Standard. We have introduced the following additional improvements:

- Addition of a Modern Slavery metric to the Supplier Assessment
- Checking Companies House and HSE Notices
- Verification of ISO and SSIP certifications
- Final management compliance check and additional level of authority for sign-off of all approvals
- And included Modern Slavery in our standard site induction template

A review was undertaken of a specific labour group during the year following concerns; this was raised to board level, and suppliers were challenged and the GLAA contacted.

Performance Indicators

The Company has reviewed its key performance indicators (KPIs) and progress on initiatives pertaining to Modern Slavery. As a result, the Company:

- Has reviewed its Subcontractor Procurement documentation to ensure that we are asking appropriate questions in our Supply Chain Questionnaire. For Modern Slavery we currently ask the following:
 - i. How do you ensure that suppliers of contingent labour ensure that personnel provided to you by them are entitled to work in the UK?
 - ii. How do you ensure that your subcontractors, consultants and suppliers ensure that their employees are entitled to work in the UK?
 - iii. Are you subject to the reporting requirements of the Modern Slavery Act 2015 and, if so, how have you complied with them?
 - iv. How do you promote awareness of Modern Slavery issues in your supply chain.

Training

The Company requires its key staff to complete specific training on modern slavery.

Over the last year this training has included:

- Modern Slavery module from new provider iHasco on our eLearning programme and getting this added to staff training plans.
- Promoting the resources within the Supply Chain Sustainability School, in particular modern slavery resources.
- 57 Modern Slavery courses had been completed over the year – this equates to about a quarter of our employees.
- Further awareness for those directly involved with the subcontractor procurement process.

We propose to increase awareness by way of a combination of:

- Organised training
- Toolbox talks
- Induction training
- Signage, Posters and access to other information (at our offices and worksites, on company intranet)
- Consultation meetings
- Focussed awareness and information share with Supply Chain

We plan to organise further stand down and supply chain days which will include focus on Modern Slavery issues.

Further Plans for the 2024-25 Year

- Targeted Modern Slavery training (using the Supply Chain Sustainability School) for Site Management.
- Review of our global material supply chain and Modern Slavery risks, eg producers of anodes.
- Continue to review our system for supply chain verification in order to identify any additional opportunities to evaluate both existing and potential suppliers.
- Provide internal guidance for what to do if you think someone is at risk.

Board Approval

This statement was approved by the Company's Board of Directors on the 4th September 2024, and will be reviewed and updated annually.

Signed



A P Rimoldi
Group Chief Executive