

Modern Slavery and Human Trafficking Statement

This statement has been produced in accordance with the Modern Slavery Act 2015. It constitutes our Modern Slavery Transparency Statement for Associated Asphalt Contracting Limited and its relevant group subsidiaries for the financial year ending 31st December 2024.

Introduction

Associated Asphalt Contracting Limited remain opposed to all unethical business behaviours both internally and demonstrated by either its clients or supply chain partners. We recognised the negative impact modern slavery has on individuals, communities and society as a whole and so we are committed to continuing to prevent these practices.

Organisation structure and supply chain

Our business activities are predominantly as a contractor within the construction sector, with additional capabilities to supply focused construction materials and professional services. We currently directly employ approximately 100 people and have a wide ranging supply chain of specialist labour providers, construction plant providers, construction materials suppliers and specialist services provision.

Our organisational structure is predominantly Associated Asphalt Contracting Limited, with a small number of wholly owned subsidiary companies operating under the Associated Asphalt brand. This policy applies to all our wholly owned businesses, all of whom are subject to the same policies, procedures and governance.

Policy in relation to slavery and human trafficking

It continues to be a priority for Associated Asphalt Contracting Limited to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

We are committed to improving our practices to combat slavery and human trafficking in our business and supply chain. To achieve this we will:

- Continue to assess modern slavery and human trafficking risks in our business and supply chain
- Continue to understand and comply with all relevant employment and human rights laws
- Ensure our supply chain partners similarly comply with current modern slavery and human trafficking legislation
- Provide ongoing training to our employees to help identify the 'red flags' of modern slavery and human trafficking
- Encourage employees and supply chain partners to report their concerns either in person or anonymously

All company employees are accountable for compliance with this Policy, with compliance managed and supported through ongoing training. The company Lead for Modern Slavery and Human Trafficking is our Head of People and our reporting tools are managed by our HSEQ Team.

We make it clear to all of our suppliers what is expected of them. All new suppliers complete the supplier pre-approval form before we commence work with them. We then continue to communicate with them through performance reviews, project inductions, toolbox talks and general communications to share updates in legislations as well as new industry best practice and reciprocal learning.

Due diligence process

Direct recruitment into our business follows a robust Recruitment Procedure that ensures we verify everybody's right to work. This predominantly requires a senior manager to verify the physical presence of a valid passport during their first days of employment. We also undertake regular employee data checks to identify potential concerns such as high occupancy of employees at the same address or requests for multiple employees salaries to be paid into the same bank account. No concerns of employee modern slavery were raised through these assessments during 2024.

The use of labour-only suppliers within the construction industry is continually highlighted as high risk to modern slavery and human trafficking. We work with a small number of trusted suppliers and request the provision of the same individuals, enabling us to integrated them with our employees. This builds trusting relationships outside their direct employers and helps us to identify the signs of modern slavery and human trafficking such as:

- Different individuals being sent to site during a project with no responsible explanation
- Supply Chain individuals not integrating on a personal level with others on the site
- Supply Chain Foremen and Managers being overly aggressive with their workers
- The general physical health and wellbeing of the individuals turning up for work

Risk assessment and management

We continue to assess the risks and to our business as part of our Strategy and Systems Control Procedures. We are aware that criminal gangs continue to target the construction industry and that the unintentional use of forced labour within our supply chain remains an active risk to our business. This risk is controlled through awareness training provided to our management team and through direct training to all employees to remain vigilant to the issue and immediately raising concerns.

We are currently working closely with the Lighthouse Foundation to promote their free 24/7 Support Telephone Line on all of our sites. This initiative provides individuals an independent helpline to provide confidential support to both witnesses and victims of modern slavery and human trafficking.

Key performance Indicators

Our leading KPI for this issue is training compliance, We also track if there has been any reported incidents of modern slavery during the year.

- During 2024 50% of employees completed their Modern Slavery Training modules
- During 2024 we had a single report of potential Modern Slavery. This incident was fully investigated and found to a legitimate employment arrangement.

Training on modern slavery and human trafficking

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have reviewed our Anti-Slavery policy and uploaded it to our SharePoint site and is displayed on our notice boards to provide access for our employees. It is further shared with stakeholders as and when appropriate.

We have further developed bite-sized training modules for all employees to complete each year to ensure they continue to understand the impact of modern slavery, remain vigilant of the common signs of the issue and know how to report their concerns.

Focus for 2025

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we will take the following further steps in 2025 to continually improve in this area:

- Identify further training that we can provide to our employees
- Review our current New Supplier Process with a view to further strengthening our current due diligence activity

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Associated Asphalt Contracting Limited's modern slavery and human trafficking statement for the financial year ending 31 December 2024. It was approved by the board on 17th October 2024.

This policy will be reviewed no less than annually

Signed:

Date: 12th March 2025



Managing Director