



Modern Slavery & Human Trafficking Policy

Introduction

Modern slavery is a serious crime that deprives people of their liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developing countries who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and supply chain.

At GRS Group we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery, human trafficking and child labour in our operations and supply chain. We have taken concrete steps to tackle modern slavery and child labour, as outlined in this policy. This policy sets out the actions we have taken to understand potential modern slavery risks related to our business and the steps implemented to prevent slavery and human trafficking during the financial year 2026/2027.

Our Business and Supply Chains

GRS Group is an ISO 9001 certified business and Britain's nationwide supply-chain partner for the sourcing, processing, handling and transportation of construction and waste materials.

Over 50 years we have developed a locally focused, service-driven business, expanding to more than 75 sites and operations nationwide. With a Group turnover of over £450 million, GRS has supplied many of Britain's high-profile infrastructure projects.

We operate nationwide within the UK. Our business is divided into three divisions: GRS Trading (Aggregates and Waste), GRS Building Products and GRS Integrated Solutions.

GRS Group is committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships.

GRS Group has not been made aware of any allegations of human trafficking or slavery activities against any of our suppliers. If we were, we would act immediately against the supplier, implement any appropriate remedial action and report it to the relevant authorities.

Supplier and Contractor Adherence

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and our contractors to comply with our values and all applicable laws and regulations. Where legally required, we expect them to publish an annual anti-slavery and human trafficking statement. We further expect our suppliers to hold their own suppliers to these same high standards.

Due Diligence and Risk Assessment

As part of our initiative to identify and mitigate risk, GRS Group takes the following actions:

- We manage and monitor our sites and offices to ensure optimum control of the work environment and compliance with applicable laws, our values and processes.
- All managers conduct checks on employed personnel to ensure they meet legal and contractual requirements. Records are maintained for all young workers employed, including dates of birth, health records and risk assessments.
- We build long-standing relationships with suppliers and clients, making clear our expectations of business behaviour.
- With regards to national supply chains, our relationship is with companies, and we expect these companies to have suitable anti-slavery and human trafficking policies and processes in place.
- With regard to overseas suppliers and higher-risk geographies we will undertake a country/sector risk-assessment framework utilising relevant guidance such as The Home Office Transparency in Supply Chains guidance and the Global Slavery Index and where appropriate conduct an enhanced due diligence and/or onboarding process in higher risk jurisdiction. We also carry out in person inspections.
- We have systems in place to encourage the reporting of concerns and the protection of whistleblowers.

Agency Workers and Temporary Labour

GRS Group operates across more than 75 sites and makes use of agency workers and temporary labour in a number of its operations, including bagging, transport, and construction activities. Agency and temporary labour supply chains represent a heightened risk area for modern slavery and labour exploitation. Accordingly, GRS Group requires that all employment agencies and labour providers supplying workers to GRS comply with all applicable UK labour laws and GRS's ethical standards. We conduct due diligence on all agency suppliers prior to engagement and review compliance on a periodic basis. Any agency found to be in breach of these requirements will have their relationship with GRS terminated.

Supplier Due Diligence

GRS Group conducts due diligence on all new suppliers, subcontractors and third party hauliers. This includes:

- Assessing risks in the provision of services and goods.
- Approval processes for all new and renewing suppliers.
- Auditing selected suppliers against our ethical sourcing and compliance standards.
- Requiring eligible suppliers to evidence their compliance with child labour legislation, and modern slavery requirements.

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- Remedial action, report and/or termination of relationships with any supplier found to be in breach of these requirements.

Child Labour

GRS Group strictly prohibits the use of child labour in any part of our operations and supply chain. We are committed to ensuring that no person under the minimum legal working age is employed or exploited in our business or by our suppliers. We require all suppliers and contractors to adhere to international standards on child labour, including compliance with International Labour Organization (ILO) conventions and UK labour laws.

Key actions include:

- Conducting rigorous age verification checks during the recruitment process.
- If a supplier breaches child labour rules, GRS will support affected workers, seek remediation where appropriate, and assess impact of termination as a last resort.
- Awareness among our staff and external relationship managers to remain observant in monitoring ongoing compliance throughout our supply chain and raise any concerns.

Supporting Policies

GRS Group operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Ethical Sourcing Policy
- Whistleblowing Policy – we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- Values – our values encourage employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.

Awareness and Training

GRS Group is committed to raising awareness of modern slavery issues across the business and demonstrating our commitment in the fight against modern slavery.

In 2026/2027 GRS Group will implement a formal programme of modern slavery awareness training for employees. This will include:

- Inclusion of modern slavery awareness within our employee induction programme.

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- Roll-out of modern slavery awareness training to existing employees, delivered through a combination of e-learning and manager-led briefings.
- Communication to employees outlining the various forms of modern slavery in which people can be held and exploited.
- Training managers to identify indicators of slavery and human trafficking and to know how to respond and report concerns.

Indicators of modern slavery that employees and managers are trained to recognise include:

- Unrealistically low prices from suppliers that may indicate exploitation
- Evidence of physical injury or psychological abuse, violence or intimidation
- Underpayment of workers or unlawful deductions from wages
- Deceptive recruitment practices, including requiring workers to pay a bond to secure employment
- Workers surrendering or not in possession of their crucial documentation such as visas or passports to an employer
- Earnings requested to go into a bank account not in the employee's name or multiple employees with same bank account numbers
- Restriction on workers' movement or freedom, picked up by the same person daily or sharing an address with several other workers
- Subjection to abusive working or living conditions
- Workers being forced to work excessive overtime
- Signs of poor personal hygiene, wearing the same clothes most of the time, appearing tired and malnourished.
- Individual exhibiting unusual behaviour when asked about home or family life, discouragement from communicating with colleagues.

Employees who suspect slavery or human trafficking should report their concerns immediately to their line manager, HR, or via the whistleblowing process. Where HR or management identify a potential victim of modern slavery, GRS will consider referral to the National Referral Mechanism (NRM) — the UK's formal framework for identifying, supporting, and protecting victims of modern slavery and human trafficking. Concerns may also be reported directly to other agencies as appropriate e.g. GLAA

Measuring Our Performance

GRS Group has defined the following key performance indicators to measure our effectiveness in combatting modern slavery and human trafficking:

- 100% compliance with Right to Work checks for all new starters, monitored and reported by HR.
- Completion rates for modern slavery awareness training – targeting 100% of the workforce within the 2026/2027 financial year.

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- Record and report number and nature of concerns raised via whistleblowing or other reporting channels, and actions taken in response.
- Due diligence completion for new suppliers and periodic reviews.
- Ongoing monitoring of supplier compliance with child labour and modern slavery requirements.

Statement Coverage and Approval

This statement covers 7 April 2026 to 6 April 2027 and was approved by the Board of GRS Group in April 2026. This statement will be reviewed and republished annually.



Jon Fisher – GRS Group CEO

April 2026