



# **Nexus Infrastructure plc**

## Policy

### Modern Slavery

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## Modern Slavery Statement

### Introduction

This statement is made in pursuant of section 54 of the Modern Slavery Act 2015 (the 'Act') and constitutes Nexus Infrastructure plc's modern slavery statement for the financial year ending 30 September 2025.

The Act requires businesses to state the steps they have taken during the financial year to ensure modern slavery is not taking place in their operations or supply chains. Modern slavery incorporates offences of slavery, servitude and forced or compulsory labour and human trafficking.

### Our Organisation

Nexus Infrastructure plc (including its subsidiaries), referred to in this statement as "Nexus" is a leading provider of essential infrastructure services operating nationally throughout the UK. The business does not operate outside of the UK and directly employs in the region of 200 employees, all of whom are based in the UK.

Nexus recognises our responsibility to take a robust approach to modern slavery and is committed to preventing modern slavery in all our activities and within our supply chain.

This statement outlines our approach to tackling modern slavery.

### Our Supply Chain and Due Diligence

Our supply chain includes sub-contractors, employment agencies and suppliers of goods and materials. We have a zero-tolerance approach to modern slavery and require our supply chain to comply with this commitment.

- **Sub-contractors** – We undertake due diligence on all sub-contractors. Each is required to complete a pre-qualification questionnaire before becoming an approved sub-contractor and modern slavery forms part of this questionnaire. Sub-contractors are required to confirm they conduct business within all applicable laws and regulations, including the Modern Slavery Act.
- **Suppliers of Goods and Materials** – Each of our subsidiaries have a procurement department that operates a database of approved goods and materials suppliers. As part of our due diligence, we require new and existing suppliers to complete a Material Supplier Audit and confirm they conduct business within all applicable laws and regulations, including the Modern Slavery Act.
- **Employment Agencies** – We undertake due diligence when considering taking on new suppliers of labour, and maintain a preferred supplier list of employment agencies

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who must comply with our Right to Work Policy (prevention of illegal working). Agencies are subject to regular audit.

## Our Policies

We have a number of policies which seek to minimise the risk of modern slavery. These include:

- **Right to Work Policy (prevention of illegal working)** which sets out the requirement to conduct right to work checks for all employees to safeguard against modern slavery.
- **Anti-Bribery and Gifts Policy** which confirms that we do not tolerate any form of bribery, whether direct or indirect. The board and senior management are committed to preventing bribery, in accordance with the Bribery Act 2010.
- **Whistle-blowing Policy** which provides employees with guidance as to how to raise any concerns, and reassurance that they can raise concerns in good faith without fear of reprisals.
- **Equality, Diversity and Inclusion Policy** which sets out our commitment to ensuring that all employees are treated fairly and are provided with a working environment, which promotes dignity and respect to all.
- **Environmental, Social and Governance Policy** which confirms that we actively look for opportunities to improve the environment and to contribute to the wellbeing of our employees and the communities in which we trade.

## Training and Advice

This statement, together with the policies outlined above, are made available to all employees via the Company intranet site and Document Management System.

Each employee and, where applicable, all other individuals covered by our policies, have a responsibility to review our policies, as well as to ensure that they fully understand our obligations and the consequences associated with any breach of those obligations.

Training on modern slavery is also provided on the Company eLearning platform.

## Within the last year we have;

- Implemented an awareness raising programme, explaining the principles of the Modern Slavery Act and how to raise a concern.
- Signed up to the GLAA (Gangmaster and Labour Abuse Authority) Construction Protocol.
- Continued to review the risk of modern slavery in our supply chain (both as regards to purchasing goods and the provision of services).
- Continued to gain knowledge and understanding of the Government's approach to minimise the risk of modern slavery practices, for use and implementation within Nexus and our supply chain.

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## Looking Ahead

For the 2025 financial year, we are committed to:

- Attending quarterly GLAA Construction Protocol meetings to represent our organisation.
- Keep up to date with information from the GLAA about the latest trends used by modern slavery perpetrators, and best practice around tackling modern slavery.
- Develop a Code of Conduct for Labour Suppliers, confirming our commitment to the highest ethical standards of labour supply and requires all supply chain partners to adhere to the code.
- Conduct a thorough review of the due diligence process applied to employment agencies, to ensure an auditable and robust procurement process is implemented.
- Continue to review the risk of modern slavery in our supply chain (both as regards to purchasing goods and the provision of services).
- Continue to raise awareness around modern slavery, explaining the principles of the Modern Slavery Act and how to raise a concern to new and existing employees.

## Approval

This statement has been approved by the Board of Directors who will review and update it periodically and within the framework of The Modern Slavery Act 2015.



Dawn Hillman  
Chief Financial Officer  
September 2024