



Anti-Slavery & Human Trafficking

FRN - PL - CC3A

Anti-Slavery & Human Trafficking Statement

1 April 2025 / 31 March 26

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Modern Slavery and Human Trafficking Statement for Ferns Group for the financial year ending 31 March 2026.

It sets out the steps we have taken during the financial year to help prevent modern slavery and human trafficking in our operations and supply chains, and our plans for continuous improvement in the next financial year.

Our organisation, business and supply chains

Ferns Group operates as a group of companies, including (as at the date of this statement):

- Ferns Surfacing Ltd (Company No. 03193093)
- Ferns Aggregates Ltd (Company No. 12217352)
- Ferns TM Ltd (Company No. 14684397)
- Ferns Drylining Ltd (Company No. 07069179)

Ferns is one of the largest independent utility infrastructure services providers in the south of the UK. We operate across sectors including Gas, Water, Telecoms, Infrastructure, Energy, Traffic Management and Aggregates, with a combined workforce of more than 1,000 staff operating across 12+ sites.

Our supply chain typically includes:

- Subcontractors and contractors supporting delivery of infrastructure works;
- Labour providers (including agency staff);
- Materials and equipment suppliers (including aggregates and construction materials);
- Plant and vehicle hire;
- Logistics/haulage providers; and
- Professional services providers.

We recognise that modern slavery risk can exist in any sector and that robust due diligence is important to identify and address risk in practice.



Our policies in relation to modern slavery and human trafficking

We have a zero tolerance approach to modern slavery and human trafficking and are committed to acting ethically and with integrity and transparency in all business dealings and relationships.

Our key policy is the AntiSlavery and Human Trafficking Policy (FRNPLCC3). This policy:

- Applies to all individuals working for, or on behalf of, Ferns Group (including employees, agency workers, contractors, consultants, directors/officers and business partners);
- Confirms our expectations that suppliers, contractors and business partners uphold equivalent standards, including prohibitions against modern slavery;
- Requires concerns to be raised promptly via line management or our whistleblowing route;
- Sets out consequences for breaches, including disciplinary action up to dismissal, and termination of supplier relationships where appropriate.

We aim to maintain transparency in our approach and will continue to keep our policies under review.

Governance and responsibility

The Board of Directors has overall responsibility for ensuring our approach to modern slavery complies with our legal and ethical obligations.

Day today responsibility for implementing our antislavery policy, monitoring effectiveness and investigating allegations sits with the Director of Safety, Health, Environment and Quality (SHEQ), supported by line managers who are responsible for ensuring colleagues understand and comply with the policy.

Due diligence processes in relation to modern slavery and human trafficking

We recognise that identifying potential victims and indicators of modern slavery can be difficult and that suppliers may attempt to conceal exploitation. We therefore consider it our responsibility to apply due diligence to reduce the risk of exploitation and to support safe working practices and compliance with relevant laws and standards.

What we have in place (current controls)

During the period covered by this statement, our approach includes:

- Communicating our zero tolerance stance to suppliers, contractors and business partners when entering into new or renewed contracts;
- Including prohibitions against modern slavery within contracting processes and expecting suppliers to hold their own suppliers to the same standards;
- Providing routes for raising concerns and protecting colleagues who report genuine concerns in good faith.

To strengthen our due diligence in line with government expectations for meaningful reporting, we will implement or enhance the following risk based controls during FY 2026/2027:

- Strengthening our documented supplier onboarding due diligence process, proportionate to risk (e.g., information requests and compliance checks for higher risk suppliers);
- A supplier risk assessment approach to prioritise higher risk categories (e.g., labour supply chains and subcontracting);
- A mechanism to record and track supplier commitments and corrective actions where issues are identified.

Risk assessment and management

Modern slavery risk can vary by sector, labour model and supply chain visibility. In our sector, risk can arise particularly in labour supply chains, subcontracting, and lower tier supply chains where oversight is limited.

Our risk management approach includes:

- Applying a zero tolerance policy and requiring compliance across our business and supply chain;
- Encouraging early escalation of concerns and investigating allegations;
- Focusing improvements on risk based supplier due diligence and monitoring as set out in this statement.

Incidents

No confirmed incidents of modern slavery were identified in our operations or supply chains during the period covered by this statement. We recognise that not identifying any risks may indicate a need to improve visibility, and our actions for FY 2026/2027 focus on strengthening due diligence and reporting.

Effectiveness: how we measure progress (KPIs)

We recognise that measuring effectiveness is a key part of demonstrating progress and improving year on year.

During FY 2026/2027, we will measure effectiveness using KPIs including (and we will report progress in the next statement):

1. % of Tier1 suppliers that have been risk assessed for modern slavery.
2. % of higher risk suppliers subject to enhanced due diligence (as defined by our risk model).
3. % of new/renewed supplier contracts containing modern slavery/ethical labour clauses.
4. Number of modern slavery concerns raised, investigated and closed (including outcomes).
5. Training completion rates for relevant colleagues (see section 7).

Training about modern slavery and human trafficking

We provide training to help colleagues understand modern slavery risk, how to recognise indicators, and how to report concerns.

Our policy commits to providing regular training as necessary and ensuring colleagues know how to identify exploitation and report suspected cases.

To provide the clarity expected in statutory statements, during FY 2026/2027 we will define and report:

- Who receives training (e.g., all staff, plus enhanced training for procurement, HR, contract managers and site leaders);
- Frequency (e.g., induction + refresher every 12 months);
- Training content (e.g., indicators, reporting routes, supplier risk, victim centred response);
- Completion tracking and evaluation.

Reporting concerns and speaking up

We aim to encourage openness and will support anyone who raises genuine concerns in good faith. Concerns can be raised through line management or in line with our whistleblowing arrangements.

Employees and others can also contact the Modern Slavery & Exploitation Helpline for information and guidance (0800 0121 700).



Continuous improvement commitments (next financial year)

During FY 2026/2027 we will prioritise the following improvements:

1. Document and implement a risk based supplier due diligence process and supplier risk assessment.
2. Define and deliver a structured training programme, with tracked completion rates.
3. Establish KPI reporting and governance to evidence effectiveness and drive improvement.
4. Maintain review of our AntiSlavery and Human Trafficking Policy and update this annual statement accordingly.

Approval and signature

This statement will be published on the Ferns Group website and made available through a prominent link in accordance with section 54 of the Modern Slavery Act 2015.

This statement was approved by the Board of Directors of Ferns Group on 6 April 2026 and has been signed by Ian David Fern on behalf of the Board:

Signed:

A handwritten signature in dark ink, appearing to read 'ID Fern', written over a light blue horizontal line.

Name: Ian David Fern

Date: 6 April 2026