



Contents

- 03 Our business
- 04 Our supply chain
- 05 Our policies
- 06 Due diligence
- 07 Risk management
- 08 Key performance indicators (KPIs)
- 09 Training

Morgan Sindall Group is committed to upholding the highest standards of human rights within our business and across our value chain by treating all people who interact with our divisions with dignity, wellbeing and respect.

This statement, published in accordance with the Modern Slavery Act 2015 ('the Act'), sets out the steps taken by Morgan Sindall Group plc ('the Company') and its subsidiary companies (together 'the Group') during the financial year ending 31 December 2024 to prevent human trafficking and slavery within its direct operations and supply chain. Offences under the Act include slavery, servitude, forced or compulsory labour, and human trafficking for the purpose of exploitation.

This statement is made pursuant to section 54 of the Act and was approved by the Board of Directors of Morgan Sindall Group plc on 24 February 2025.

John Morgan

Chief Executive

For and on behalf of Morgan Sindall Group plc

Our business

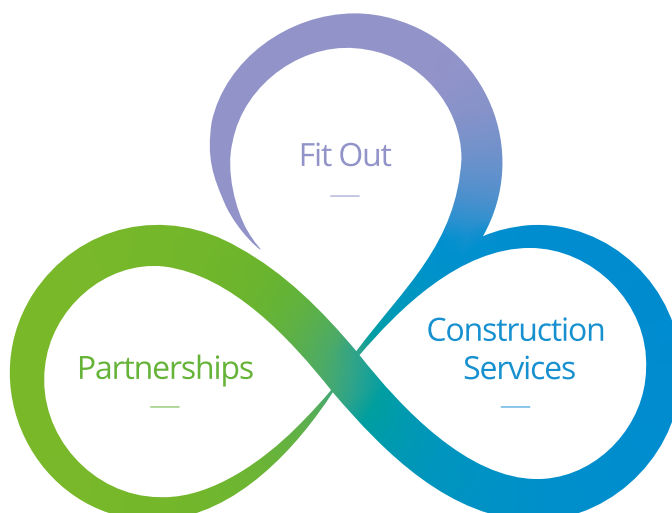
Morgan Sindall is the partnerships, fit out and construction services Group.

With revenues of £4.5bn and over 8,000 employees, Morgan Sindall Group operates in the public, regulated and private sectors. As an organisation with projects up and down the UK, we strive to attract and retain the best talent to serve our clients and stakeholders. Our capabilities are aligned with sectors of the UK economy which support demand for affordable housing, urban placemaking and investment in public, commercial and social infrastructure.

Our business model seeks to generate cash from fit out and construction services and invest in long-term partnership schemes which in turn create opportunities in construction.

Our divisions

Our divisions are complementary but different, and our decentralised approach enables them to respond quickly to the specific needs of their markets.



Partnerships

Partnership Housing

LOVELL

Partnerships with local authorities and housing associations. Mixed-tenure developments, building/developing homes for open market sale and for social/affordable rent, design and build house contracting, and planned maintenance and refurbishment.

lovell.co.uk

Mixed Use Partnerships

MUSE

Transforming the urban landscape through partnership working and the development of multi-phase sites and mixed-use placemaking.

museplaces.com

Fit Out

Fit Out

 **overbury**

Fit out and refurbishment in commercial, central and local government offices, as well as further education.

overbury.com

Morgan Lovell

Office interior design and build services direct to occupiers.

morganlovell.co.uk

Construction Services

Construction

MORGAN SINDALL
CONSTRUCTION

Education, healthcare, commercial, industrial, leisure and retail markets.

morgansindallconstruction.com

Infrastructure

MORGAN SINDALL
INFRASTRUCTURE

Energy, nuclear, rail, highways, water and defence markets.

morgansindallinfrastructure.com

BakerHicks

Infrastructure includes the BakerHicks design activities based out of the UK and Switzerland.

bakerhicks.com

Property Services

MORGAN SINDALL
PROPERTY SERVICES

Response and planned maintenance services for social housing and the wider public sector.

morgansindallpropertyservices.com

Our supply chain

Our longstanding relationships with supply chain partners are essential to the success of our business. We are committed to working with them to embed high standards of ethics and compliance across the value chain.

We work with thousands of suppliers across the UK who provide the materials, services and solutions we need to deliver our projects. With a high percentage of small to medium-sized enterprises accounting for the majority of our procurement spend, it is vital that we collaborate to raise supply chain standards.

We work closely with our Morgan Sindall Supply Chain Family of 416 preferred suppliers and manufacturers to provide dedicated training opportunities, on-site practical advice, access to contract information and a dedicated relationship management team. By establishing strong relationships with these close partners, we can open clear lines of communication and align our standards to a common set of principles.

For the purposes of this statement, we treat our joint venture entities (where we are responsible for the management and operation of a joint venture) as part of our supply chain. We are committed to collaborating with all project partners to deliver ethically and responsibly while identifying and eliminating all forms of modern slavery.

Further information on our business and supply chain can be found on our website: www.morgansindall.com.



Our policies

Morgan Sindall Group will not tolerate any form of modern slavery or human trafficking taking place in any part of our business or supply chain. In accordance with the Act, we are committed to respecting the human rights of all people who interact with our business. This stance is reinforced through our Group policies and Core Values.

Key modern slavery and human trafficking policies

Our Code of Conduct (the 'Code') sets out the behaviours we expect of our people when engaging with our clients, colleagues, suppliers and communities as well as what they can expect from their relationship with the Group. It ensures that we act in line with our Core Values (as detailed below), relevant laws and regulations, industry standards and stakeholder expectations.

Our Human Rights Policy supplements the Code by setting out our support for the UN Guiding Principles on Business and Human Rights and the UN Universal Declaration of Human Rights. This includes a commitment to the principles of diversity and inclusion, non-discrimination and non-harassment, prevention of human trafficking, elimination of forced and child labour, workplace health and safety, freedom of association and supply chain compliance. Our modern slavery policy also sets out our commitment to preventing all forms of modern slavery in our divisions, subsidiaries, associations and joint ventures.

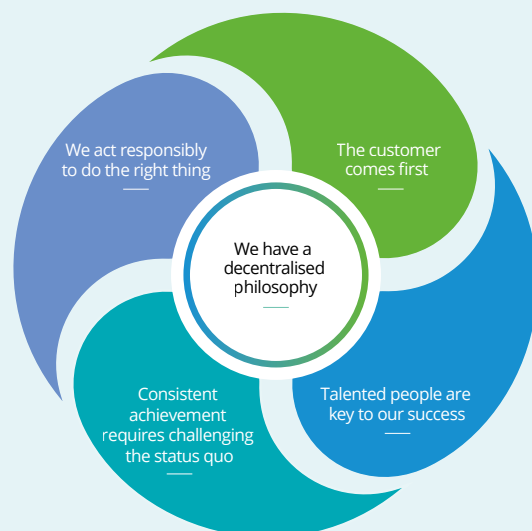
For supply chain partners, our Supplier Code of Conduct sets out the obligations and responsibilities that we uphold, with the expectation that our suppliers maintain the same ethical standards in their business dealings with, or on behalf of, every division of the Group. It includes a requirement that our suppliers respect human rights and provide fair working conditions for their employees, as well as requesting that they take action to identify and prevent modern slavery within their operations and supply chain.

All Group policies are regularly reviewed by our management team, including our Group general counsel & company secretary, our Group director of sustainability and procurement, Group head of audit and assurance, as well as divisional heads of HR. The Board reviews our annual modern slavery and human trafficking statements and, as part of its review, considers the Group's actions to ensure that the risk of modern slavery is being appropriately mitigated.

Our Core Values

Our Core Values define our culture and drive our purpose to harness the energy of our people to achieve the improbable.

By living our values, we are eliminating risk and acting responsibly to do the right thing.



➔ Read more about our Core Values, policies and processes in our 2024 annual report: www.morgansindall.com

Due diligence

We recognise the need to undertake rigorous checks to manage risk and mitigate modern slavery throughout the Group. We achieve this through effective supplier screening, onboarding and monitoring.

Prior to engaging in work, our divisions screen all prospective suppliers and subcontractors using detailed prequalification questionnaires (PQs), which include mandatory questions relating to their practices and performance. In 2024, we simplified our question set while requiring additional information relating to our suppliers' environmental, social and governance commitments. Based on the responses received, divisions were able to select suppliers and subcontractors whose compliance standards and terms align with our own.

Our PQ process is supported by a dedicated supplier onboarding platform which allows us to identify, vet and engage a pool of over 50,000 prequalified suppliers against a range of industry standards, regulations and risk criteria. In doing so, we can mitigate any risks associated with our projects and drive improved supplier performance. We also require higher-risk suppliers to provide additional evidence such as right-to-work eligibility checks and other targeted questions where appropriate. Tier 1 suppliers must be re-accredited every 24 months to ensure ongoing compliance.

Once projects commence, we monitor ongoing compliance via our internal audit programme. The Board's audit committee and general counsel & company secretary hold ultimate oversight on human rights and modern slavery, including monitoring all concerns raised through our grievance procedure. Our confidential whistleblowing service, 'Raising Concerns', is an independently run service operated by Safecall, where employees and contractors can confidentially raise any concern or suspected non-compliance without fear of retaliation. In 2024, we received 36 calls to the hotline, and found no instances of modern slavery within our business or within our immediate supply chain.

In our divisions, HR leads and audit managers directly investigate and manage any individual cases or causes for concern for their business as appropriate. Divisions are responsible for raising awareness and providing training relating to modern slavery, as well as outlining the steps our employees should take to prevent human rights breaches within our operations (see 'Training' on page 9). In 2024, we rolled out an industry-wide awareness campaign targeted at site workers on how to spot the signs of modern slavery and report it. This included a poster campaign at our sites, which details how site workers should report any concerns to Safecall or the Gangmaster Labour Abuse Authority (GLAA).



Risk management

We seek to proactively manage the risk of modern slavery and human trafficking through our robust risk management process.

While human rights breaches are not considered a principal risk of the Group, we do recognise that there may be a risk of breach by overseas suppliers or that there may be workers on our sites who are victims of modern slavery.

In addition, we risk the use of low-skilled or migrant labour supplied by subcontractors, specifically in relation to waste management and recycling, cleaning services, demolition, road works and general construction trades. Moreover, the decentralised nature of our business, diverse nature of operations and high number of projects means that we can have on average 20,000 subcontractors providing services to our sites and offices on an annual basis.

To mitigate these risks, we operate a multi-layered strategy to reduce the likelihood of modern slavery or forced labour occurring in our supply chain. We have robust due diligence and risk assessments in place, including prequalification criteria for potential suppliers, contractual obligations and minimum trading standards; we provide modern slavery training to our suppliers through the Supply Chain Sustainability School (SCSS); and we collaborate with industry organisations and peers to inform best practices.

By developing and maintaining relationships with our supply chain partners that are built on trust, accountability and transparency, we are better able to determine potential risks and take proactive measures towards mitigating them.

➔ [Read more about our approach to managing risk in our 2024 annual report at: www.morgansindall.com](https://www.morgansindall.com)



Eliminating modern slavery in construction

In 2024, we partnered with 11 construction companies and labour agencies to re-energise awareness of modern slavery in our industry and increase the chances of exploitation being reported. Recognising the importance of training programmes and site inductions in raising awareness among site workers, we commissioned anti-slavery charity Unseen UK to produce a powerful film that highlights the everyday reality for victims of modern slavery. The film will be used across the sector to demonstrate signs of exploitation that site teams can look out for. The film was screened in October 2024 at the SCSS's 'Built Environment Against Modern Slavery' event and has been shared on the social channels of all partners involved in the project to extend its reach across the sector.

Key performance indicators (KPIs)

We track our progress in monitoring and eliminating modern slavery and human trafficking by using a number of KPIs which are measured across our divisions.

Training

Code of Conduct training undertaken by

81%

of employees in 2024

Modern slavery training undertaken by

6,578

employees in 2024

Suppliers registered with the SCSS

2,835

in 2024

Supplier engagement

Suppliers attending training workshops through SCSS

591

in 2024

Number of prequalified suppliers

> 50,000

in 2024

Whistleblower reports

Safecall reports received

36

in 2024

Number of reports relating to modern slavery

0

in 2024



Training

All new employees are required to undertake a modern slavery e-learning module as part of our mandatory onboarding and induction process.

Training related to modern slavery appears in three e-learning modules run by the Group. It appears in the Group Code of Conduct e-learning, is part of a stand-alone module and features again in our e-learning on financial integrity. All modules conclude with a test to assess employee's understanding of how to identify the risks and signs of modern slavery, which they are required to pass.

Our group general counsel & company secretary is responsible for the creation of the training content, and if an employee fails the test twice, they are required to undertake additional learning by speaking to their divisional training lead, head of legal service or our general counsel & company secretary to ensure that they fully understand the issues raised. Group training is supplemented by additional divisional-level training for procurement teams, including additional modern slavery awareness training for targeted employees.

For our suppliers, our relationship with the SCSS remains a critical partnership for delivering compliance-related education. At the end of 2024, 2,835 suppliers were actively registered with the SCSS (2023: 2,833) and an additional 591 suppliers attended dedicated training workshops in 2024, covering a wide range of sustainability topics including modern slavery training modules. Several of our divisions also worked with anti-slavery charity partners Unseen UK in 2024 to refine training, divisional policies and audit processes.

Modern slavery training conducted in 2024

Who	Format	Trainer	Frequency	Expert input in compiling training
All employees	E-learning	Online	On joining with refresher course every three years	General counsel & company secretary, Group director of procurement and sustainability, and external law firm Pinsent Masons LLP
All site workers	Toolbox talk	Site manager/ contracts manager	As determined by the site manager	General counsel & company secretary, GLAA
Procurement teams	E-learning	Online	Annually	SCSS

Morgan Sindall Group plc

Kent House
14-17 Market Place
London, W1W 8AJ

Company number: 00521970
@morgansindall
morgansindall.com