

Modern Day Slavery Statement

Policy:	Modern Day Slavery Statement	Valid as of:	12.06.2026
Released by:	Legal Department	Next review:	30.05.2027
		Reviewed and issued annually	

This statement covers the activities of KAEFER Limited. It sets out KAEFER Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chain.

This statement relates to actions and activities during the financial year for 2025.

As part of the sector in which we work, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chain is free from slavery and human trafficking.

ORGANISATIONAL STRUCTURE

KAEFER operates across the United Kingdom and the Republic of Ireland providing scaffolding, access, insulation, industrial cleaning, asbestos removal, coatings and other industrial services to the nuclear, defence, energy and industrial sectors. Our revenue in 2025 was £351m and we have over 3,000 employees across our UK and Ireland business.

KAEFER in the UK is a part of the larger KAEFER Group, headquartered in Bremen, Germany. The KAEFER Group Policy Statement on Human Rights and Environmental Protection (available at [Policy-Statement-HR-Environment-EN.pdf](#)) sets out the core principles with which all group companies must comply.

SUPPLY CHAIN

We recognise that it is crucial for us as an organisation to have oversight of our supply chains so that we can understand the risks of modern slavery along the chain and take action to mitigate against those risks.

Organisation and supply chain structure

Procurement of goods and services is managed centrally by the UK Supply Chain team.

The majority of our material suppliers are UK-based, with most being distributors, which enhances our visibility and control over our direct supply chain. Our supply chain includes a diverse range of suppliers and subcontractors supporting our core services: scaffolding, insulation, surface protection, and plant and equipment provision.

We engage subcontractors specialising in labour-intensive services across these areas, ensuring skilled professionals deliver high-quality and safe work.

Direct labour on many of the sites where we operate is governed by recognised industry agreements approved by the Thermal Insulation Contractors Association (TICA) and the National Joint Council for the Engineering Construction Industry and others. These frameworks establish clear standards for labour practices, safety, and ethical conduct, further mitigating risks related to modern slavery.

POLICIES & PROCEDURES

The organisation operates the following procedures that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking within its own operations. All employees are made aware of these policies and are expected to adhere to them in carrying out their duties as employees of KAEFER. We also expect our business partners, vendors and contractors to comply with the KAEFER Code of Business Conduct.

KAEFER's Policies & Procedures

Our procedures reflect KAEFER's continuing responsibility to combat slavery and human trafficking and are reviewed annually.

KAEFER's Speak Up Rule/Whistleblowing Procedure

This ensures that both employees and non-employees can raise any concerns or wrongdoings, including slavery and human trafficking in a confidential way. The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities or the supply chain of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's Speak Up

rule/whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline. We make the rule and procedure visible with regular communications, mandatory trainings and communicated at induction.

KAEFER Code of Business Conduct

The KAEFER Code of Business Conduct and compliance programme set out our policies relating to our corporate goals and values as KAEFER is strongly committed to risk management and compliance. The KAEFER Code of Business Conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct, ethical behaviour when operating in any capacity as a KAEFER representative and in managing its supply chain.

KAEFER Compliance

At KAEFER we understand Compliance as a set of guidelines, rules and procedures that are designed to prevent, monitor and resolve anything that does not conform with legal, ethical and business standards.

KAEFER Compliance Management System involves several components:

- A compliance organisation with local and global contact persons: Expert Group Compliance Officers. KAEFER's Local Compliance Officer is Russell Cook, Head of Finance & Compliance.
- A confidential and secure KAEFER Compliance Helpline (a "whistleblowing" helpline) is available, which allows employees to contact the KAEFER Compliance team for advice, to raise concerns or to report potential wrongdoing, misconduct, unethical and criminal behaviour or regulatory issues. Reports can be made anonymously if desired.

The KAEFER Group Policy Statement on Human Rights and Environmental Protection (available at [Policy-Statement-HR-Environment-EN.pdf](#)) with which KAEFER is required to comply is guided by international standards and frameworks, including, but not limited to, The Declaration of the International Labour Organization on Fundamental Rights and Principles at Work

RISK, DUE DILIGENCE AND SUPPLY CHAIN APPROVAL

Responsibility for Modern Day Slavery Risk Management

Responsibility for compliance with modern slavery risk management sits with KAEFER's people and development team and local compliance officer in respect of internal labour standards; and with our supply chain and ESG teams with respect to mitigating risks of human right violations in our supply chain.

Risk Assessment

KAEFER has identified the following areas in its supply chain, which pose the highest risk of modern slavery and unethical business practices:

- Where vendors are providing materials which contain materials that originate from the Democratic Republic of Congo or adjoining countries in accordance with the US Securities Exchange Commission Rule of Conflict Minerals issued on 22 August 2012 and any updates thereof; and
- Where labour agencies are providing unskilled labour.

KAEFER has not identified any other area which present an increased risk of modern slavery or human trafficking in its supply chain.

Recognising the high proportion of spend on labour and subcontracted services as a heightened risk area, we maintain rigorous oversight and engagement with our subcontractors. To further mitigate labour supply risks, in 2025 we appointed a managed service provider (MSP) model for temporary labour and our chosen MSP is a reputable company and provides the majority of our temporary labour requirements. We collaborate closely with our MSP partner to embed robust compliance and governance processes into our operations, ensuring transparent and ethical labour management.

While the predominance of UK-based suppliers reduces risk, we remain vigilant and proactive in identifying and addressing potential issues.

KAEFER has an open and transparent process in its supply chain and as part of its initiative to identify and mitigate risk, require all those in its supply chain to comply with its Code of Business Conduct. KAEFER Limited has in place a supply chain compliance programme which is undertaken by the Supply Chain Department.

KAEFER's vendor approval process requires that we:

- Identify and assess potential risk areas in our supply chain.
- Mitigate the risk of slavery and human trafficking occurring in our supply chain.
- Monitor potential risk areas in our supply chain.
- Protect whistle blowers.
- Invoke sanctions against vendors that fail to improve their performance in line with an action plan or seriously violate our vendor code of conduct, including the termination of the business relationship.

KAEFER takes a risk-based approach to the onboarding of new vendors and undertakes appropriate due diligence prior to engaging with new vendors. All new vendors are required to go through a robust appraisal process and agree and sign acceptance of the KAEFER Supplier Code of Conduct and the KAEFER Code of Business Conduct. Prospective vendors are asked to explain how their organisation ensures that its own employees and those of its suppliers behave in an ethical manner and how they ensure their workers benefit from acceptable labour standards and their human rights are respected. Copies of modern-day slavery policies are also requested for our review. Approved vendors are periodically assessed to ensure that they continue to meet the criteria and standards expected and are subject to audits in line with the KAEFER audit schedule. KAEFER does not directly source any materials from the Democratic Republic of Congo or adjoining countries.

We monitor the effectiveness of our efforts through supplier audits, employee feedback, and incident reporting mechanisms. To promote transparency and accountability, KAEFER provides a dedicated whistleblowing service enabling employees, subcontractors, and suppliers to confidentially report concerns related to modern slavery or unethical conduct.

We also require all labour agencies we engage to maintain equivalent whistleblowing processes, ensuring workers within their supply chains have trusted channels to raise concerns without fear of retaliation.

During the reporting period, no incidents of modern slavery were identified within our operations or supply chains.

KAEFER is independently audited to BS EN ISO 9001, 14001 & 45001 and SSIP (safety schemes in procurement) on a regular basis to conduct an externally facilitated review to bring insights on ways to we can tackle slavery and human trafficking.

EMPLOYEES

With regards to many of our site-based employees, KAEFER works to a number of national, site agreements which mandate pay and working conditions and in doing so recognises the trade unions which operate in the industry. Many of our customers also place contractual requirements on us to respect minimum standards of welfare and remuneration for our employees.

We only employ agency workers through reputable employment agencies that adhere to our standards regarding anti-slavery and human trafficking. The majority of temporary labour requirements are met via our MSP.

TRAINING

KAEFER provides the following mandatory training to all employees:

- KAEFER Code of Business Conduct
- Anti – Corruption
- Fair Competition & Anti-Trust
- Conflicts of Interest
- Fraud Prevention

Periodic communication is provided to ensure that employees are aware of the Speak Up rule/whistleblowing process and points of contact.

We provide regular training and awareness programs to employees on our business code of conduct and compliance rules to ensure a thorough understanding of modern slavery risks and the importance of ethical practices.

Additionally, Category Leads within our Central Supply Chain team complete the Chartered Institute of Procurement & Supply (CIPS) Ethical Procurement and Supply training. This specialised training enhances their ability to identify, assess, and mitigate modern slavery risks within our supply chains, strengthening our risk management capabilities.

Several of the Supply Chain team are members of the Chartered Institute of Procurement and Supply and demonstrate their commitment to ethical business practices through additional learning and CPD.

In 2025, KAEFER Group implemented ESG training for its vendors globally using the online Integrity Next Platform. The platform is a vendor self-assessment tool which gathers data to identify areas for improvement in compliance and enhances KAEFER's vendor appraisal process.

MONITORING AND EVALUATION

KAEFER monitors and will continue to monitor the effectiveness of its measures through audits and will consider the introduction of appropriate key performance indicators (KPIs) if failures are identified. Appointing our MSP in 2025 to channel the provision of the majority of our temporary labour needs is a major step towards mitigating risks of slavery in our temporary labour.

During the financial year 2025, KAEFER carried out 20 audits on its supply chain. No instances of modern slavery or human trafficking have been identified for the financial year ending December 2025.

By the end of 2025, 200 of KAEFER's suppliers had been through the Integrity Next assessment process. KAEFER works with those vendors whose results indicate they need further assistance in implementing processes and procedures to manage the risk of modern slavery and human trafficking to bring them up to a standard which is acceptable to KAEFER and our focus during 2025 was to help companies gain a higher traffic lights score starting with the vendors who scored red on the system.

We intend to increase the number of Vendor audits in 2026 to 26, ensuring those vendors that are considered a higher risk of modern slavery and human trafficking are treated as a priority.

OUR FUTURE COMMITMENTS

KAEFER is committed to continuously improving our approach to eradicating modern slavery. We will implement comprehensive supply chain mapping to gain deeper visibility into all tiers of our supply network, enabling more accurate risk identification and proactive supplier engagement.

We plan to leverage advanced technology, including data analytics and digital tools, to develop dynamic heat maps highlighting areas of higher modern slavery risk. These tools will help us prioritise resources and interventions effectively.

Furthermore, we will enhance onboarding and supplier due diligence processes by incorporating additional targeted questions related to modern slavery for vendors identified as medium and high risk through our heat mapping. This will ensure these suppliers meet our ethical standards before engagement.

We will implement a supply chain risk register for 2026 to help us to track and mitigate risks of modern-day slavery in our supply chain.

We will also expand training programs and supplier engagement initiatives to foster greater awareness and collaboration. Through these combined efforts, KAEFER will strengthen its commitment to ethical business.

This statement was approved by the organisation's Board of Directors who review and update it annually. It was approved by the directors on 12 June 2026. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking for the financial year ending December 2025.

This statement was signed by Christopher Foulkes, CEO of KAEFER Limited on 15th June 2026.

