

Anti Slavery and Ethical Trading Policy Statement

GW Highways Ltd is committed to preventing modern-day slavery, human trafficking, forced labour and child labour within its business and supply chain, including sub-contractors.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation. These as well as the suppliers of services make up the supply chain within GW Highways Ltd.

Modern day slavery refers to any practice where individuals are coerced, forced, or deceived into work, often under threat of punishment, and are not free to leave their work conditions. This includes;

Slavery: The state of being owned or controlled by another person.

Human trafficking: The illegal trade of humans for purposes such as forced labour, sexual exploitation and involuntary servitude.

Forced Labour: Work or service which is exacted from any person under threat of punishment and for which the person has not offered themselves voluntarily.

Child labour: Work performed by children under the legal working age or work that is detrimental to their physical, mental or emotional development.

Our commitment

GW Highways are committed to:

- Zero tolerance of modern-day slavery and human trafficking within our business and supply chain.
- Comply with all applicable laws, including Modern day slavery act 2015.
- Ensure that our supply chain are monitored and that our supply chain adhere to ethical standards.
- Promoting awareness of modern-day slavery within our workforce and supply chains.
- Take prompt and effective action for any breaches of this policy

Responsibilities

Management: Senior leaders and managers are responsible for ensuring the policy is implemented within their teams, promoting a culture of awareness and addressing any issues.

Employees: All employees are encouraged to report any concerns or suspicions in the workplace or supply chain.

Suppliers and contractors: Are expected to adhere to the principles set out and demonstrate their commitment to eliminating modern-day slavery within their own operations.

Reporting

We encourage a culture where concerns about modern-day slavery can be reported without fear. All concerns should be raised to a member of the senior management team who will treat any report confidentially and investigated with care.

As part of the company's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored. Goods from outside the UK and the EU will be procured only from Ethical Trading Initiative registered companies.

The company will not support or deal with any business knowingly involved in slavery or human trafficking. The Directors shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

Policy Authorised By



David Gibbins, Director

POL009 Rev 1 Date: 01/04/2026



Luke Wenham, Director

