

Policy: Modern Slavery

Introduction

Envolve Infrastructure Ltd is committed to the prevention of Modern Slavery and Human Trafficking and will not tolerate or condone any such identified act within any aspect of its business activities.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes Envolve Infrastructure Ltd's Modern Slavery and Human Trafficking Statement for the financial year ending 30 September 2026.

Organisational Structure

Envolve Infrastructure Ltd provides a diverse range of specialist construction and engineering services in support of the creation maintenance of assets for both public and private sector customers in the Infrastructure Sector.

Envolve Infrastructure Ltd operates in the United Kingdom where most of the work is delivered by a directly employed workforce all of whom are fully eligible to work within the United Kingdom.

Supply Chain

Given the nature of Envolve Infrastructure Ltd organisation structure of directly employed work delivery utilising a UK based Supply Chain, we consider that any exposure to risk Modern Slavery or Human Trafficking is extremely low and that should any risk exist it is most likely to be within the extended Supply Chain. We work closely with our Tier 1 Supply Chain members in the identification of such risk to ensure it is addressed in an appropriate manner.

Modern Slavery Policy

We operate a risk-based approach to the identification of Slavery and Human Trafficking the principle of which is based on the location of the product or service, industry sector, supplier relationships and existing data held supported by additional information and guidance obtained from, but not limited to, sources such as Global Slavery Index, Corruption Perceptions and US Department of Labour Lists of Goods and Suppliers.

Due Diligence and Identification of Risk

Envolve Infrastructure Ltd policy of direct employment is supported by robust processes which ensure that and individual's identity is confirmed and they have legitimate right to work in the United Kingdom. This policy and the right to work checks minimise the risk of employing forced labour or those who may be subject to Human Trafficking.

On occasions, where we Utilise labour only sub-contractors the introduction of due diligence checks ensures that, as a minimum, labour providers comply with our commitment to the prevention of Modern Slavery and their processes for the recruitment contain no illegal labour practices.

Effectiveness in Preventing Modern Slavery and Human Trafficking

Envolve Infrastructure Ltd is committed to continually monitoring the effectiveness of its controls and procedures in preventing modern slavery and human trafficking within its operations and supply chain.

To measure the effectiveness of our approach, we monitor the following key performance indicators:

- 100% of directly employed personnel are subject to Right to Work checks prior to employment.
- 100% of labour-only subcontractors and agency providers are required to confirm compliance with applicable employment legislation and modern slavery requirements through the onboarding process and are reviewed annually.
- All reported concerns relating to modern slavery, forced labour or unethical employment practices are investigated and appropriately addressed.
- If a Supply chain partner is identified as presenting a higher risk, they are subject to additional due diligence and review.
- No incidents of modern slavery or human trafficking have been identified within Envolve Infrastructure Ltd's operations during the reporting period.

The Board of Directors reviews these measures annually and will continue to develop additional monitoring and reporting arrangements as the business grows.

Communication and Training

Envolve Infrastructure Ltd recognises that awareness is a key factor in identifying and preventing modern slavery and human trafficking.

The Company's commitment to preventing modern slavery is communicated to employees, managers and supply chain partners through company policies, management briefings and induction processes.

Training and awareness measures include:

- Employee induction covering ethical employment practices and the Company's commitment to preventing modern slavery.
- Management awareness relating to the identification of potential indicators of forced labour, exploitation and human trafficking.
- Guidance for personnel involved in recruitment, labour engagement and supply chain management on recognising and reporting concerns.
- Periodic policy review and communication updates to ensure staff remain aware of their responsibilities.

Employees are encouraged to report any concerns regarding suspected modern slavery or human trafficking through normal management channels, with all concerns being treated seriously and investigated appropriately.

The Board of Directors remains committed to continually improving awareness and competence across the business regarding modern slavery risks.

Approval

This Modern Slavery and Human Trafficking Statement has been reviewed and approved by the Board of Directors of Envolve Infrastructure Ltd and will be reviewed annually.

Name: Jamie Prichard
Managing Director on behalf of Envolve Infrastructure LTD

Signed:



Date: 1st December 2025

To be reviewed: Dec 2026