



MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

We are committed to preventing unethical labour practices occurring in any part of our business operations or in any part of our supply chain. The Policy applies to all Costain employees as well as, suppliers and joint venture partners, who must ensure that their businesses and supply chains worldwide work to our highest ethical standards and comply with this Policy.

Costain will take steps to prevent labour abuses including, modern slavery and human trafficking occurring in our operations or in that of our supply chain.

We will ensure that:

- All workers have freedom of movement and prohibit the imposition of worker-paid recruitment fees, compulsory overtime, and confiscation of original identification documents.
- Any reports of labour abuses will be quickly and sensitively investigated, with the protection of victims being paramount. Investigations will be conducted in full cooperation with the police and/or Gangmasters and Labour Abuse Authority (GLAA).
- All Strategic and Preferred suppliers must be accredited to either Achilles Building Confidence or Common Assessment Standard scheme. All other Suppliers must have submitted a Pre-qualification document, which also covers compliance with the Modern Slavery Act as a minimum.
- All recruitment is carried out in a fair and transparent manner and will comply with relevant legislation and standards. Any form of coercion or exploitation will be strictly prohibited.
- We engage with the supply chain to communicate our expectations in relation to the Act, which will be clearly communicated and included within contractual terms.
- Suppliers will be expected to comply with the Immigration, Asylum and Nationality Act 2006.
- Costain will take a partnership approach with regards to working with its suppliers to combat the threat of modern slavery and human trafficking across its sectors and all the industries in which it operates.
- Costain will train appropriate staff to understand the risks and issues surrounding modern slavery and human trafficking, including how to identify it, appropriate measures to prevent it, and address instances of exploitation.

All employees have an individual responsibility to ensure compliance with this Policy, including being alert to the risk of such unlawful practices and reporting anything suspicious. Any concerns may be reported to the General Counsel & Company Secretary or using Costain Ethics Point website or the confidential telephone helpline number **0800 102 6576** as detailed in [LEG-H-014](#) How To whistle-blow.

Modern Slavery and human trafficking are serious criminal offences and a violation of fundamental human rights. Any violation or breach of this Policy or the Modern Slavery Act by an employee will result in disciplinary action, up to and including dismissal in appropriate circumstances. In addition, Costain will notify the relevant authorities of an individual or a supplier's contravention of the Act.

This Policy will be reviewed annually to ensure that it reflects current legislation and regulations.

Signed: 
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A Vaughan (Chief Executive Officer)

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