



## Modern Slavery Act 2015 Statement

Engenda Group recognises that the engineering construction industry can play an important part in preventing the exploitation of vulnerable people. Our industry relies on people and it is essential that we work in partnership to ensure all workers enjoy the protection of human rights. Engenda Group is committed to the principles outlined in the United Nations Declaration of Human Rights. Engenda Group strive for transparency and upholding the highest ethical standards in our business operations. This Modern Slavery Statement outlines our organizational structure, the nature of our business, and the steps we take to ensure our supply chains are free from modern slavery and human trafficking.

### Organisation structure and supply chains

Engenda Group is a leading provider of engineering, technical, and maintenance services across various industries. We operate in the engineering construction industry with capabilities in Engineering and Design, Project Management, Site Services, Manufacturing, Training and Resourcing. Engenda Group provides turnkey projects, process automation, mechanical and electrical installation and a complete engineering design process to support the petrochemical, process and power generation industries. Our headquarters are located in Runcorn, Cheshire, and we have seven offices UK wide.

Engenda Group prioritizes the welfare and rights of all individuals, both within our organization and throughout our supply chains. We conduct our business operations with integrity, fairness, and respect for human rights. We aim to create a safe, inclusive, and ethical working environment, aiming for zero-harm to our stakeholders.

We recognize the importance of ensuring that our supply chains are free from modern slavery and human trafficking. We have a large and varied supply chain consisting of nearly 800 companies, ranging from sole traders to sophisticated international companies across various geographic regions. Our wide network of suppliers, subcontractors, and partners play a crucial role in delivering our services.

We are dedicated to conducting due diligence to identify and mitigate the risks of modern slavery in our supply chains. Our procurement and supplier management processes include assessments, audits, and evaluations to ensure our suppliers adhere to our high ethical standards. We actively engage with our suppliers, promoting transparency and responsible practices throughout the supply chain. We expect our suppliers to share our commitment to eradicating modern slavery and human trafficking. Our supplier agreements and contracts include provisions that explicitly prohibit the use of forced labour, child labour, or any form of exploitative practices. Non-compliance with our standards will result in the reassessment of supplier relationships. By continuously monitoring and evaluating our supply chains, we strive to identify any areas of vulnerability and take proactive measures to address them effectively. We are committed to working collaboratively with our suppliers, industry partners, and relevant stakeholders to drive sustainable improvements in supply chain practices and combat modern slavery.

### Policies relating to slavery and human trafficking

At Engenda Group, we are fully committed to combating modern slavery and human trafficking in all its forms. We maintain a zero-tolerance approach to these crimes and strive to ensure that our business operations and supply chains are free from such exploitative practices. This statement is supported by our Anti-Slavery Policy which applies to all employees, contractors, and suppliers and outlines mandatory responsibilities for reporting and preventing modern slavery. In addition, our Safeguarding, Dignity at Work, Diversity & Inclusion, Whistleblowing, and Recruitment policies each support anti-slavery protections and help ensure safe and fair treatment throughout the organisation. This Modern Slavery Statement outlines our policies, commitments, and the measures we have implemented to ensure compliance with relevant legislation and regulations.

Engenda Group has established a Code of Conduct and comprehensive policies to prevent and address modern slavery and human trafficking. Our Code of Conduct summarises a number of internal policies and practices that make our commitments a reality. These policies are embedded in our company culture and govern the conduct of our employees, suppliers, and stakeholders. Our policies explicitly prohibit any involvement in or facilitation of modern slavery or human trafficking activities. They are regularly reviewed and updated to align with emerging best practices and evolving legal requirements.

We prioritize the following key principles to safeguard the rights and well-being of employees and actively prevent any instances of modern slavery:

**Freedom of Workers to Terminate Employment:** We respect and uphold the freedom of workers to terminate their employment voluntarily, without fear of repercussions or penalties. We provide a supportive and inclusive working environment that promotes open communication, employee well-being, and fair treatment.

**Freedom of Movement:** Engenda Group firmly supports the freedom of movement for all workers. We do not restrict or impede their ability to move freely within or outside their workplace. We are committed to eliminating any practices that could hinder the freedom of movement or personal liberty of individuals.

**Freedom of Association:** We recognize and respect the rights of workers to freely associate, form or join labour unions, and engage in collective bargaining as permitted by local laws. We foster an inclusive culture that values open dialogue, employee engagement, and constructive labour-management relations.

**Prohibition of Threats, Violence, Harassment, and Intimidation:** Engenda Group has strict policies and procedures in place to prohibit any form of threats, violence, harassment, or intimidation towards workers. We maintain a zero-tolerance approach to such behaviour and provide channels for reporting incidents confidentially, ensuring that appropriate actions are taken to address and prevent any misconduct.

**Prohibition of Worker-Paid Recruitment Fees:** We ensure that our recruitment practices are fair, transparent, and compliant with relevant laws and regulations. We work diligently to identify and mitigate any risks associated with exploitative recruitment practices.

**Compulsory Overtime:** We adhere to legal limits on working hours and ensure that our employees maintain reasonable working hours that prioritize employee health, safety, and work-life balance.

**Prohibition of Child Labour:** We have a zero-tolerance policy towards child labour. Engenda Group strictly prohibits the use of child labour in any aspect of our operations or supply chains. We conduct thorough due diligence and implement robust control mechanisms to verify the age and eligibility of workers.

**Prohibition of Discrimination:** Engenda Group is committed to creating an inclusive and diverse workforce where every individual is treated with respect and dignity. We prohibit discrimination based on race, gender, age, religion, disability, nationality, or any other protected characteristic. We promote equal opportunities, fair treatment, and non-discriminatory practices throughout our organization.

**Protection of Workers' Original Identification Documents:** We ensure that workers retain possession of their original identification documents, such as passports or identification cards, at all times. We prohibit the confiscation, withholding, or retention of any worker's personal identification documents by Engenda Group or any of our suppliers.

We are unwavering in our commitment to promoting ethical practices and protecting human rights. Our senior management team provides visible leadership in driving our commitment to combat modern slavery and human trafficking throughout the organization. We believe that collaboration with our employees, suppliers, industry peers, and other stakeholders is crucial in achieving our goals.

Engenda Group is dedicated to ensuring compliance with all applicable legislation and regulations related to modern slavery and human trafficking. We closely monitor legal developments in this area to stay up to date with emerging requirements and expectations. Our compliance program includes regular assessments and reviews to ensure that our policies and practices remain effective and aligned with the evolving legal landscape. To strengthen our compliance efforts, we conduct internal audits and risk assessments to identify any areas of vulnerability within our operations and supply chains.

We recognize the importance of raising awareness and fostering a culture of vigilance among our employees and stakeholders. Engenda Group provides training that educate our staff about the risks associated with modern slavery and human trafficking. This training equips our employees with the knowledge and tools to identify, prevent, and report any suspicious activities. We also encourage open communication channels to facilitate the reporting of concerns and potential breaches.

Our commitment to combating modern slavery and human trafficking goes beyond mere compliance. We continuously evaluate and enhance our policies, procedures, and due diligence processes to improve our effectiveness in addressing these issues.

#### Due Diligence

At Engenda Group, we are committed to proactively identifying and assessing the potential risks of modern slavery and human trafficking within our supply chains. We recognize the importance of due diligence in mitigating these risks and ensuring ethical practices throughout our operations. This Modern Slavery Statement outlines the steps we take to identify and assess the risks of modern slavery in our supply chains.

Engenda Group conducts thorough assessments of our suppliers to evaluate their compliance with our high ethical standards. We have established a robust supplier assessment process that includes a comprehensive evaluation of potential suppliers before engaging in business relationships. Our assessment criteria include considerations such as labour practices, health and safety standards, human rights, and adherence to relevant legislation. To ensure ongoing compliance and accountability, we conduct audits of our suppliers. These audits are designed to assess their adherence to our policies and requirements, including their efforts to combat modern slavery and human trafficking. Our audit procedures may involve site visits, document reviews, interviews, and other verification processes. Through these audits, we aim to gain visibility into our supply chains and identify any potential areas of concern.

Engenda Group uses risk analysis to map and prioritize the areas of highest risk within our supply chains. We evaluate various factors, including geographic locations, industries, product categories, and the complexity of supplier relationships. This analysis helps us focus our resources and due diligence efforts on areas where the risk of modern slavery is deemed higher. We engage with our suppliers to foster transparency and responsible practices. We encourage open dialogue and collaboration to address potential risks and improve supply chain transparency. We expect our suppliers to share our commitment to combating modern slavery and human trafficking. Through these collaborative efforts, we promote awareness, share best practices, and drive continuous improvements within our supply chains.

Engenda Group is dedicated to continuously improving our processes for identifying and assessing the risks of modern slavery in our supply chains. We monitor emerging trends, industry standards, and evolving best practices to enhance our due diligence procedures. We actively seek feedback from stakeholders, including employees, suppliers, and external experts, to identify areas for improvement and stay at the forefront of anti-slavery efforts.

By taking these steps, Engenda Group strives to ensure that our supply chains are free from the risks of modern slavery and human trafficking. We are committed to working collaboratively with our suppliers and stakeholders to maintain the highest ethical standards throughout our operations.

#### Assessing and managing risks

Engenda Group recognizes the importance of a proactive approach to mitigating the risks of modern slavery and ensuring ethical practices. Engenda Group conducts comprehensive risk assessments to identify and evaluate the potential risks of modern slavery within our operations and supply chains. These assessments encompass a thorough analysis of our business processes, geographic locations, supplier relationships, and other relevant factors. By understanding the potential risks, we can develop targeted strategies to address them effectively.

Based on our risk assessments, Engenda Group implements robust risk mitigation strategies. We develop and implement policies, procedures, and controls designed to prevent and detect modern slavery. These strategies include clear guidelines and expectations for our employees and suppliers, emphasizing compliance with relevant legislation and ethical standards.

We understand that raising awareness and providing training is essential in preventing and combating modern slavery. Engenda Group has implemented comprehensive training programs to educate our employees, suppliers, and stakeholders about the risks of modern slavery and the importance of ethical practices. Our training initiatives cover topics such as identifying signs of exploitation, reporting mechanisms, and responsible sourcing.

Engenda Group actively engages with our suppliers to foster transparency and improve supply chain practices. We encourage open and honest dialogue to address potential risks and promote responsible sourcing. We regularly review our purchasing practices so as not to unintentionally put pressure on suppliers leading to poor recruitment practices, worker conditions and low pay for workers. For example, we avoid wherever possible:

- Aggressive pricing that does not consider sustainable production costs
- Short lead times, late cancellations or late high-volume orders
- Inaccurate forecasting

## Late or extended payments or unfair penalties

We work closely with our suppliers to enhance their understanding of our expectations regarding modern slavery prevention. Through collaboration and shared responsibility, we aim to improve transparency and promote ethical practices throughout our supply chains.

We have implemented a robust due diligence process for our suppliers to ensure they adhere to our high ethical standards. Engenda Group conducts regular assessments, audits, and evaluations to verify our suppliers' compliance with our policies and requirements. We encourage our suppliers to engage in responsible sourcing practices and provide transparent information regarding their own supply chains.

Engenda Group is committed to continuously improving our approach to assessing and managing the risks of modern slavery. We monitor industry best practices, regulatory developments, and emerging trends to stay at the forefront of modern slavery prevention. We actively seek feedback from stakeholders, including employees, suppliers, and external experts, to identify areas for improvement and drive continuous enhancements in our risk management strategies.

## Effectiveness of policies and procedures to prevent modern slavery

We are dedicated to preventing modern slavery and human trafficking throughout our operations and supply chains. We continually evaluate the effectiveness of our policies and procedures to ensure their impact in combating these crimes. Engenda Group's commitment to preventing modern slavery has yielded significant successes. By implementing rigorous policies and procedures, we have been able to maintain a robust framework that helps safeguard against modern slavery risks. Some of our successes include:

**Enhanced Supplier Compliance:** Our efforts to engage with suppliers and enforce stringent standards have resulted in increased compliance with our policies. Through regular assessments and audits, we have seen improved transparency and responsible practices within our supply chains.

**Recruitment Compliance:** Our recruitment process includes adequate checks to ensure the prevention of child labour, forced labour, bonded labour or involuntary imprisonment. Where possible we always employ our workers directly so as to remove the risk of debt-bondage.

**Empowered Workforce:** Our comprehensive training programs have empowered our employees to recognize and report potential instances of modern slavery. This heightened awareness has contributed to the early detection and prevention of such practices, creating a strong internal culture of vigilance.

While we have achieved successes in our efforts to prevent modern slavery, we also acknowledge the challenges involved. Some challenges we have encountered include:

**Complex Supply Chains:** Our supply chains can be complex, involving multiple tiers and geographic regions. Ensuring transparency and accountability throughout these chains presents challenges in identifying and addressing potential risks. We actively collaborate with suppliers and industry partners to navigate these complexities effectively.

**Emerging Risks:** Modern slavery risks continue to evolve, and new forms of exploitation may emerge. Staying ahead of these emerging risks requires ongoing monitoring, assessment, and adaptability. We remain vigilant in our efforts to identify and address emerging challenges promptly.

Engenda Group is committed to continuous improvement in our modern slavery prevention measures. We actively seek feedback and evaluate our practices to make necessary improvements. Some of the improvements we have made include:

**Strengthened Due Diligence:** We have enhanced our due diligence processes to ensure a more comprehensive assessment of our suppliers' adherence to our standards. This includes the implementation of more robust verification mechanisms and increased focus on supply chain transparency.

**Collaborative Initiatives:** Engenda Group actively participates in collaborative initiatives with industry peers, governmental organizations, and non-governmental organizations to share best practices and drive industry-wide improvements. Through these collaborations, we strive to establish unified approaches to combat modern slavery.

**Technology and Data Analysis:** We are exploring technological solutions and data analysis tools to enhance our ability to detect and mitigate modern slavery risks within our supply chains. Leveraging technology allows us to analyse data, identify patterns, and proactively address potential risks.

#### Training Programs and Initiatives to Raise Awareness

We recognize the importance of raising awareness and educating our employees and relevant stakeholders about the risks of modern slavery and human trafficking. We are committed to fostering a culture of vigilance and ensuring that everyone within our organization understands the importance of ethical practices.

Engenda Group has developed training programs that are designed to educate our employees and stakeholders about the risks and signs of modern slavery. These programs cover a range of topics, including:

**Identifying Signs of Exploitation:** We provide training on recognizing indicators and red flags that may suggest the presence of modern slavery within our operations and supply chains. This includes educating participants on different forms of exploitation, such as forced labour, debt bondage, and human trafficking.

**Reporting Mechanisms:** We emphasize the importance of reporting any suspicions or concerns related to modern slavery. Our training programs provide clear guidance on the reporting procedures, ensuring that employees and stakeholders know how to raise concerns and where to seek assistance.

**Legal and Ethical Requirements:** We educate our employees and stakeholders about the relevant legislation and regulations pertaining to modern slavery. This includes providing an understanding of their legal obligations, as well as our company's policies and expectations regarding ethical practices.

Engenda Group maintains open communication channels to facilitate the reporting of concerns and potential instances of modern slavery. We encourage our employees and stakeholders to speak up and report any suspicions or information related to modern slavery. Engenda Group will always take a victim centred approach to allegations of modern slavery so as to safeguard the victim. Wherever we can, we will support victims of modern slavery in their pursuit of justice and compensation. Engenda Group will always support the authorities in their investigations into modern slavery. Where a supplier self-reports potential or actual instances of modern slavery within their organisation or supply chain, and if they take immediate and proactive corrective actions, Engenda Group will not automatically suspend trade with the supplier. Instead, consideration on a case-by-case basis will be taken to assess the next steps taken by Engenda Group. We encourage and support supplier self-disclosure when issues arise, favouring remediation and corrective action over disengagement where appropriate.

Engenda Group recognizes that awareness is an ongoing process. In addition to initial training programs, we conduct regular awareness campaigns to reinforce our commitment to combating modern slavery. These initiatives serve as reminders and provide updates on emerging trends, prevention strategies, and the importance of ethical practices.

#### Collaboration with external organisations and industry initiatives

Engenda Group recognizes the importance of collective action in combating modern slavery and human trafficking. Engenda Group actively collaborates with external organizations to prevent and eradicate modern slavery.

Engenda Group actively participates in industry-wide initiatives and collaborations aimed at combatting modern slavery. We contribute our expertise, share best practices, and work collectively with industry peers to address the challenges posed by modern slavery. These initiatives foster dialogue, collaboration, and the development of industry-specific solutions to prevent and detect modern slavery within our sector.

We recognize the crucial role that government agencies play in the fight against modern slavery. We continue to respond to updated Home Office statutory guidance on modern slavery reporting and are preparing for future regulatory changes relating to mandatory supply chain due diligence. Engenda Group will engage with relevant government bodies, regulatory authorities, and law enforcement agencies to support their efforts. We actively participate in consultations, provide input on legislation, and share information to help shape effective policies and regulations.

Engenda Group's modern slavery controls are externally validated through the audit process for several of our external accreditations, including the Achilles UVDB B2 audit process, confirming our compliance with industry best practice.

We believe in the power of sharing knowledge and best practices to drive meaningful change. Engenda Group actively contributes to forums, conferences, and workshops where we can share our experiences and insights with industry stakeholders. By sharing our successes, challenges, and lessons learned, we aim to inspire others and contribute to a collective effort to combat modern slavery.

#### Future plans for addressing modern slavery

Engenda Group recognizes that the fight against modern slavery requires ongoing vigilance and proactive measures. This Modern Slavery Statement outlines our future plans, targets, and initiatives to further enhance our efforts in combating modern slavery.

**Strengthening Supply Chain Due Diligence:** We will continue to enhance our supply chain due diligence processes to ensure that all our suppliers adhere to our high ethical standards. This includes conducting regular assessments, audits, and evaluations to verify compliance and promote transparency throughout our supply chains. We will explore innovative solutions and leverage technology to improve the efficiency and effectiveness of our due diligence processes.

**Increasing Supplier Engagement and Collaboration:** We will further strengthen our engagement with suppliers to foster a culture of responsible sourcing and transparency. We will actively collaborate with our suppliers to share best practices, provide guidance on modern slavery prevention, and address any identified risks. Through collaboration and shared responsibility, we aim to promote ethical practices and drive positive change across our supply chains.

**Continued Training and Awareness Programs:** We will invest in ongoing training and awareness programs to ensure that all employees and relevant stakeholders understand the risks and signs of modern slavery. We will provide regular updates on emerging trends, prevention strategies, and our policies to keep everyone informed and equipped to identify and report any potential instances of modern slavery. We will also leverage various communication channels to foster an open dialogue and encourage the reporting of concerns.

**Monitoring and Continuous Improvement:** We are committed to continuously monitoring and evaluating our practices to identify areas for improvement. We will closely follow industry best practices, regulatory developments, and emerging trends in the field of modern slavery prevention. By actively seeking feedback from stakeholders, conducting internal audits, and engaging with external experts, we will drive continuous enhancements in our risk management strategies and practices.

**Collaboration with Stakeholders:** We will actively collaborate with external organizations, industry peers, and government agencies to share knowledge, resources, and best practices. We will participate in industry initiatives, forums, and working groups to collectively address modern slavery risks and drive sector-wide improvements. Our commitment to preventing modern slavery is also aligned with our broader social value strategy, including ethical procurement, local employment initiatives, and community support programmes. By forging strong partnerships and engaging in meaningful collaborations, we aim to contribute to a sustainable and ethical business environment.

**Setting Measurable Targets:** We will set measurable targets to track our progress in addressing modern slavery risks and improving our practices. These targets may include increasing supplier compliance rates, enhancing employee awareness and reporting mechanisms, reducing risks within specific regions or tiers of our supply chains, and achieving industry certifications or accreditations related to responsible sourcing.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our Modern Slavery Statement for the financial year ending 31<sup>st</sup> December 2025.



Gemma Meadows, Managing Director  
14<sup>th</sup> January 2026