

Algeco UK Limited

Modern Slavery & Human Trafficking Compliance Statement

June 2025

1. INTRODUCTION

At Algeco UK Limited (“**Algeco**”) we operate our business in a responsible manner and to the highest standards of business conduct in order to ensure compliance with all applicable laws and regulations. As such, we are committed to constantly improving our practices across our business and taking positive steps to combat modern slavery and human trafficking in our supply chains.

We acknowledge that slavery can occur in many forms, including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting. Whilst we have already taken steps to comply with the legal requirements to combat various forms of modern slavery, we continue to improve our governance framework and practices to prevent modern slavery.

This statement presents the actions already taken and our continuous plans to address modern slavery.

2. OUR STRUCTURE AND SUPPLY CHAINS

Our business:

Algeco provides relocatable accommodation in the UK, including portable cabins, modular buildings, permanent buildings, secure storage, portable toilets, temporary fencing, and related products and services. We provide modular buildings for sale and rent, and off-site permanent buildings for sale throughout the UK for temporary, semi-permanent and permanent use across a wide range of sectors. With the head office at Ravenstock House, 28 Falcon Court, Preston Farm Business Park, Stockton-On-Tees, TS18 3TX, Algeco operates a network of branches throughout England, Scotland and Wales. We are a subsidiary of the Modulaire Group, which has around 5,000 employees and operates in 23 countries across Europe and the Asia-Pacific region.

Further details about Algeco can be found at: <https://www.algeco.co.uk/> and our parent company, Modulaire, at <https://www.modulairegroup.com/>

Governance and Accountability:

Modulaire’s ESGS Committee and Board oversee our modern slavery prevention measures, continuously refining our approach to align with best practices. Algeco UK’s Managing Director is responsible for ensuring compliance with anti-modern slavery and human trafficking policies within the UK operations.

Supply chains:

Depending on the products or services, we engage with our suppliers through different forms, such as one-off purchases or long-term supply contracts. In 2024, we purchased from 1,275 suppliers, of which 170 represented the top 80% of our spend (our “Key Tier 1 suppliers”). The majority of our suppliers are UK-based. We have not yet mapped our supply chains below Tier 1.

Most of our vendors and subcontractors broadly cover the following categories of goods and services:

- Materials for buildings, including steel components, walls and panels, insulation, electrical components, plumbing supplies and flooring; and
- Sub-contract services for construction, specific delivery, installation, disassembly and repair/maintenance work.

Relationships with bodies representing workers:

At Algeco, all employees have a voice through the following channels, which enable collaboration, progress initiatives and resolve issues raised by colleagues:

- Engagement Champions: this is a voluntary forum specifically focusing on active employee involvement and engagement. It is an opportunity to share thinking, ideas, and opinions in a constructive environment to improve the employee experience of working at Algeco. The ideas are then fed back to the Senior Leadership Team and wider where appropriate to take action for improvement.
- Our Speak-Up policy provides a safe and accessible way for employees, contractors, and stakeholders to report concerns related to unethical or unlawful behaviour, including potential instances of modern slavery or human trafficking (further details are in sections 3 and 4).

3. POLICIES ON MODERN SLAVERY & HUMAN TRAFFICKING

Algeco has a governance framework, which we continue to review and improve to monitor and address modern slavery. Our governance underpins how we conduct our business and interact with suppliers:

- We have various policies and procedures regarding labour rights in place, such as the Code of Ethics, best practice recruitment processes, the right of workers to terminate employment, freedom of movement, the right to associate and engage in collective bargaining, as well as prohibiting any threat of violence, harassment, or intimidation. We also prohibit compulsory overtime, child labour, and the confiscation of workers' original identification documents.
- Our Supplier Code of Conduct, ESG & Sustainability (ESGS) Policy, Responsible Sourcing Policy, and Code of Ethics reflect our commitment to acting ethically and with integrity in all business relationships.
- Our Responsible Sourcing Policy and Guidelines, outline our requirements and procedures to collaborate with suppliers, embed ESG at all stages and require us to review ESGS performance as part of routine supplier relationships, improve our knowledge of the supply chains upon which we depend and drive continuous ESGS improvements.
- To ensure that those in our supply chains and our contractors comply with our values, we require vendors to sign up to our Supplier Code of Conduct, including a commitment not to use slave labour or participate in human trafficking. We seek acknowledgement of signing up at the onboarding stage for our suppliers, and if they fail to comply, the trading relationship may be discontinued.
- We nurture a transparent culture where anyone can raise concerns about our business without fearing retaliation. Our Speak-Up policy (referred to in relationships with bodies representing workers) outlines how reports can be made and whistle-blower protections.

- Our policies are publicly available and accessible on our website: <https://www.algeco.co.uk/terms-and-conditions>
<https://www.algeco.co.uk/>
- Our policies are developed by respective business functions in collaboration and consultation with relevant teams across the business. The policies are underpinned by international frameworks and standards, including UNGC principles, ILO, and ISO suits. Any updates to the policies are communicated internally. We explain the key policies to our key strategic suppliers and also welcome feedback from our vendors on improvements to our purchasing policies.
- We are in the process of developing a Supplier's handbook, which outlines our policies and requirements for vendors. Once the handbook is launched, it will be communicated to our suppliers.

4. RISK ASSESSMENT & MANAGEMENT:

Our modern slavery risk assessment considers three key factors: vulnerable populations, high-risk sectors, and high-risk geographies. Based on these risk factors, we identified that there are varying levels of modern slavery risk exposure across our business:

Direct business operation:

We can potentially be exposed to modern slavery risk as an employer. However, as the majority of our workforce is directly employed and we use reputable employment agencies for temporary staff, we consider the risk of modern slavery within our own organisation to be low.

We monitor and mitigate this risk through our existing governance framework and comply with relevant national labour legislation. We have policies and procedures relating to staff employment and their onboarding, including our approach to modern slavery and intolerance of any form of bullying or discrimination.

Our Supply chain:

We can potentially be exposed to modern slavery risk if it is present in our supply chain, for example, through goods from high-risk countries or base-skill workers engaged in high-risk category services such as cleaning or building maintenance. Based on our supply chain profile, the risk of modern slavery in direct suppliers remains relatively low. We recognise that the risk of modern slavery may increase further down our supply chain (Tiers 2 and below) where we have lower visibility and generally lower ability to influence.

Our Customers:

There may be a risk of exposure to modern slavery through leasing services, for example, units provided to clients operating in sectors with base-skill labour and long, complex supply chains can present a higher risk of exposure to modern slavery, for example, in construction.

Actions taken to assess and address modern slavery risks:

To assess & address the risks of modern slavery in our business, our ESGS, Legal, HR, and Procurement teams have undertaken the following actions:

- Set up a mechanism to allow people to safely report modern slavery risks in our business operations and supply chains through our Speak-Up policy. Any reports of suspected slavery or exploitation made through our confidential helpline, managed by a third party, would be reviewed by Modulaire Group's Legal Counsel, who would determine the appropriate investigation;

- Rolled out a refresher training on ethics, which covered the issue of modern slavery, to all of our employees with access to email.
- Ensured appropriate recruitment processes and procedures were in place, including conducting eligibility to work checks for all employees to mitigate against human trafficking or forced labour. When engaging with recruitment agencies for the provision of temporary workers, we make it explicitly clear that we expect the same rigorous vetting standards to be applied as those used for our directly employed staff. This includes verifying the right to work in the UK, ensuring that the name on the passport matches the bank account details, and carrying out appropriate identity and eligibility checks. These expectations are communicated at the outset of the relationship and monitored to help prevent the risk of modern slavery, illegal working, or exploitative labour practices.
- Launched a Responsible Sourcing Policy and Supplier ESG Assessment process to review our suppliers' risks related to ESGs (including Modern Slavery). Where risk is identified during the Supplier ESG Assessment, we will identify lessons or opportunities for improvement to be shared with the Procurement team, the ESGS Committee, and the Board as necessary. Where issues are identified, we agree on corrective actions between the relevant parties, documenting the process and outcomes.
- Carried out a double materiality Assessment (DMA) to identify topics that our stakeholders shared as being material to our organisation. The exercise has raised salient human rights issues, which are addressed through our ESGS strategy.
- Our suppliers are required to sign up to our Terms & Conditions, which include the Supplier's Code of Conduct. The code requires suppliers to commit not to use slave labour or participate in human trafficking.

5. DUE DILIGENCE PROCESSES FOR SLAVERY & HUMAN TRAFFICKING

In accordance with our Responsible Sourcing Policy, we request our direct suppliers to cascade human rights and modern slavery standards throughout their own supply chains.

Supplier ESG Assessment and Screening

Under the Responsible Sourcing Policy, our approach to assessing and screening suppliers' ESG & modern slavery is based on the following risk factors: high-risk geographies, high-risk sectors, and vulnerable populations. Supplier assessment and screening consist of three options depending on the situation and requirements.

- Assessment Level 1 – rapid screening and classification of supplier ESG performance and associated risks.
- Assessment Level 2 - detailed questionnaire for assessing and classifying supplier ESG performance and associated risks.
- Assessment Level 3 - in-depth due diligence on an individual supplier. This in-depth questionnaire comprises questions on ESG considerations for the assurance of single products from high-risk sectors or geographies.

Management of the process

- We typically prioritise high-spend suppliers or supply chains which are inherently high-risk by their geography or sector.

- We commence with Key Tier-1 Suppliers and those in higher-risk geographies. Before service engagement, all newly engaged vendors will need to complete our Supplier ESG Assessment.
- If suppliers do not conform to our screening and improvement process, we should not use them.

6. TRAINING:

We delivered an online refresher training module on modern slavery as mandatory training for our employees who have access to emails. The training provided a basic understanding of what modern slavery is, identified the signs of potential modern slavery abuses and victims in our operations and supply chains, explained how modern slavery affects our business, and promoted our Speak-Up policy for reporting modern slavery issues. Our parent company, Modulaire Group, worked with an external online training provider to develop the training, which was then rolled out on their platform. Modern slavery will be featured as an annual part of our training programme and included in our annual ethics refresher course.

7. MONITORING & EVALUATION

We have KPIs to measure the effectiveness of our practices in addressing modern slavery within our business operations and across our supply chains. Aligning with our parent company's global activities, Algeco UK's practices and KPIs related to modern slavery are reviewed at our parent company's Executive Committee and ESGS Committee to ensure we are on track.

In addition, we align our approach to sourcing with principles from international development organisations, such as:

- The International Labour Organisation's (ILO) Fundamental Principles and Rights at Work. These principles cover core workers' rights such as freedom of association, the elimination of forced labour, and non-discrimination.
- The United Nations Guiding Principles for Business and Human Rights (UNGPs). These provide a framework for the measures that nations and businesses should implement to protect and respect human rights.
- United Nations Global Compact (UNGC). Our parent company has been a signatory to the UNGC since 2021. The assessment framework and reporting/communications mechanism of UNGC also help us assess the effectiveness of our measures in addressing modern slavery. Modulaire Group reports annually on our progress in sustainable corporate governance against the ten Principles through a Communication on Progress report. <https://unglobalcompact.org/what-is-gc/participants/144802-Modulaire-Group>

Our parent company's Executive Committee & ESGS Committee develop and cascade the annual objectives and KPIs to Algeco UK. We track our objectives and KPIs in the following areas:

Responsible Sourcing assessment for direct suppliers: 57% of our key suppliers, which account for 90% of our spend, have completed the mandatory Supplier assessment and screening as part of our Responsible Sourcing Policy. This is an ongoing process, and we aim to have 100% of our suppliers complete the assessment.

Educate employees to address modern slavery: 91% of employees with access to email completed the training on modern slavery as of the end of 2024.

Our ESGS, Procurement, and HR teams track progress against objectives and targets and report regularly to the Board.

8. PROCESS OF CONSULTATION

We have brought this statement to the attention of our Procurement team, ESG & Sustainability team, and HR team. We discussed the details of the Modern Slavery Act 2015's reporting requirements and our strategies for addressing these requirements. We also allowed them to provide feedback, raise queries, and have these queries answered. We have also involved our Legal and Procurement teams in further assessing the risk of non-compliance in our supply chains.

9. OTHERS

Fully aware of the importance of businesses in combating modern slavery, Algeco UK actively presents our work at international and local forums to raise awareness of the issue. We also constantly learn from other organisations and quickly employ best practices to improve our actions on the topic.

10. ENDORSEMENT OF THIS STATEMENT

This statement was approved by the Board of Algeco UK.

Ceredig Jones
Chief Financial Officer
Algeco UK Limited