

# Algeco UK Limited

## Modern Slavery & Human Trafficking Compliance Statement

June 2026

### 1. INTRODUCTION

At Algeco UK Limited (“**Algeco**”), we operate our business in a responsible manner and in 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 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 BUSINESS, ORGANISATIONAL STRUCTURE, AND SUPPLY CHAINS

#### Business and Organisational Structure:

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 member of the Modulaire Group, which has around 4,500 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 Environment, Social, Governance, and Sustainability (ESGS) Committee and Board oversee our modern slavery prevention measures and continuously refine our approach to align with best practices. Algeco UK’s Managing Director is responsible for overseeing compliance with anti-modern slavery and human trafficking policies within the UK operations.

#### Stakeholder Engagement:

At Algeco, we encourage open communication and provide employees, contractors, suppliers, and other stakeholders with channels to raise concerns, share feedback, and engage with leadership.

- **Colleague Connect:** A business-wide communication forum that enables employees to engage directly with senior leadership, receive updates on business performance and strategic priorities, and share ideas, feedback, and questions in an open and constructive environment.
- **Speak-Up Policy:** Provides a confidential and accessible mechanism for employees, contractors, and other stakeholders to report concerns relating to unethical, unlawful, or inappropriate conduct,

including suspected instances of modern slavery, forced labour, or human trafficking. All reports are reviewed and investigated in accordance with our established procedures.

- **Modulaire Group's ESGS Forum:** A platform that enables employees to stay informed about emerging ESGS developments, including modern slavery and human rights issues, while sharing and learning best practices from businesses across the Modulaire Group's operations in 23 countries. The Forum also features external experts and guest speakers who provide insights on relevant sustainability and responsible business topics.

### Supply Chains:

Depending on the products or services procured, we engage with our suppliers through various arrangements, including one-off purchases and long-term supply contracts. In 2025, we purchased goods and services from 1,122 suppliers, of which 132 represented the top 80% of our spend (our "Key Tier 1 suppliers"). While the majority of our suppliers are UK-based, some materials and components may originate from wider international supply chains. 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.

## 3. POLICIES ON MODERN SLAVERY & HUMAN TRAFFICKING

Algeco maintains a governance framework that supports the identification, prevention, and management of modern slavery risks across our operations and supply chains. We continue to review and strengthen our approach to ensure alignment with evolving legal requirements and best practices.

Our commitment to ethical business conduct is supported by a range of policies and procedures, including:

- **Labour Rights and Employment Practices:** We uphold fundamental labour rights through policies and procedures that support fair recruitment practices, workers' freedom of movement, the right to terminate employment, freedom of association, and the right to collective bargaining. We prohibit all forms of forced labour, compulsory overtime, child labour, violence, harassment, intimidation, and the confiscation of workers' original identification documents.
- **Responsible Business Conduct:** Our Code of Ethics, ESGS Policy, Responsible Sourcing Policy, Supplier Code of Conduct, and Supplier Handbook set out our expectations for ethical business conduct and responsible supply chain practices. These policies are developed and maintained by the relevant business functions in consultation with key stakeholders across the organisation. The policies are underpinned by international frameworks and standards, including United Nations Global Compact (UNGC) principles, International Labour Organisation (ILO) Core Conventions, and relevant ISO standards. Policy updates are communicated to employees through internal communication channels.
- **Reporting and Grievance Mechanisms:** Through our Speak-Up Policy and associated reporting channels, employees, contractors, suppliers, and other stakeholders can confidentially raise concerns regarding suspected unethical conduct, including modern slavery, forced labour, and human trafficking. 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.

Our policies are publicly available on our website and form an integral part of our approach to preventing modern slavery and promoting responsible business practices throughout our operations and supply chains:

<https://www.algeco.co.uk/terms-and-conditions>

<https://www.algeco.co.uk/>

#### 4. ASSESSING & MANAGING MODERN SLAVERY RISKS:

##### Risk Assessment:

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 operations:** 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 labour, we consider the risk of modern slavery within our own organisation to be relatively low.
- **Supply chains:** We can potentially be exposed to modern slavery risk if it is present in our supply chain through goods from high-risk sectors (such as steel components, walls, panels, etc.), or geographies, 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.
- **Customers & End Users:** 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.

##### Managing the Risks:

We implement a range of controls and due diligence measures to mitigate the risks identified above.

- **Operational controls:** We continue to maintain and strengthen a range of governance, training, and risk management measures designed to prevent, identify, and address modern slavery risks across our operations and supply chains. These measures include employee training and awareness programmes, policies and procedures relating to labour rights, ethical business conduct, responsible sourcing, supplier contractual requirements, and confidential reporting and grievance mechanisms (see Sections 3 and 6 for details).
- **Employment practices:** Our employment and onboarding processes are designed to support compliance with applicable labour legislation and reinforce our commitment to preventing modern slavery, as well as maintaining a workplace free from bullying, harassment, and discrimination. As part of these processes, we conduct eligibility-to-work checks for all employees to mitigate the risk of human trafficking, forced labour, and illegal working. When engaging recruitment agencies for temporary workers, we require equivalent vetting standards to those applied to directly employed staff. This includes verifying the right to work, ensuring that the name on the passport matches the bank account details, and carrying out appropriate identity and eligibility checks.

Our employees are required to review and acknowledge our core policies issued by our parent company – Modulaire Group - upon joining, using the provided documentation and onboarding materials. These policies include the Code of Ethics covering integrity, compliance, conflicts of interest, anti-bribery and corruption, respectful conduct, confidentiality, and reporting concerns, as well as wider policies on data protection, health and safety, equal opportunities, whistleblowing, cybersecurity, and acceptable IT use. Employees with a connection to our internal system also receive structured compliance training at onboarding, with regular refresher modules, such as the Code of Ethics, that cover the Modern Slavery topic. All employees are expected to understand and follow the policies relevant to their roles and locations, thereby supporting the organisation's commitment to responsible and ethical business conduct. Our approach prioritises fair pay, safe working environments and access to wellbeing support.

- **Supplier Responsible Sourcing Assessment:** Following the launch of our parent company's Responsible Sourcing Policy in 2024, we implemented a Responsible Sourcing Assessment to review suppliers' ESG risks, including modern slavery risks, within our direct suppliers. By the end of 2025, the programme had been rolled out to our Key Tier 1 suppliers. Of these suppliers, 57% completed the assessment. We continue to apply this assessment process to monitor supplier risks relating to modern slavery and broader ESG matters.

Where risk is identified during the 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 among the relevant parties and document the process and outcomes.

- **Supplier contractual controls:** 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.
- **Supplier awareness-raising & training:** Our Supplier Handbook, issued in 2025, sets out our policies, expectations, and requirements alongside guidance, tools, and resources for vendors in relation to responsible sourcing and ethical business conduct. The Handbook was communicated directly to suppliers and is also publicly available on our [website](#). In addition, since early 2026, we have rolled out a pilot Supply Chain Sustainability training programme in partnership with the United Nations Global Compact (UNGC).

## 5. DUE DILIGENCE PROCESSES FOR SLAVERY & HUMAN TRAFFICKING

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 (as detailed in Section 4). 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 profiles.

## 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 profiles. 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:

### Employee Training & Awareness-raising

- We delivered an annual online ethics refresher training module that covers modern slavery for our employees with access to email. 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.

In 2025, 80% employees completed the ethics refresher training.

- Through our ESG Forum, attended by employees across different functions and levels, we periodically raise awareness of modern slavery risks and share good practices for identifying and addressing them. In 2025, a key client shared practical insights from their experience of exposure to and addressing modern slavery risks within their supply chain. The case study provided a valuable learning opportunity and improved employees' understanding of how modern slavery risks can arise in practice, as well as the importance of effective due diligence and response measures.

**Supplier Training & Awareness-raising:** see Section 4 – Managing the Risks for details.

## 7. MONITORING & EVALUATION

We assess the effectiveness of our actions to identify, prevent, and mitigate modern slavery risks through ongoing governance oversight, performance monitoring, and regular review of key indicators.

- Our ESGS, Procurement, and HR teams track progress against objectives and targets and report regularly to the Board.
- We maintain KPIs and monitoring processes to evaluate the effectiveness of our actions in addressing modern slavery risks within our operations and supply chains. In line with our parent company's global approach, Algeco's modern slavery programme and associated KPIs are reviewed by the Executive Committee and ESGS Committee to support continuous improvement and ensure we remain on track.

Key indicators used to assess the effectiveness of our approach include:

- Supplier participation in the Responsible Sourcing Assessment programme among suppliers within scope;
- Findings from the Responsible Sourcing Assessment, including identified risks, corrective action plans, and remediation outcomes;

- Completion rates for employee training and awareness programmes relating to modern slavery and ethical business conduct;
  - Reports and concerns raised through our Whistle-Blower Policy and associated reporting channels; and
  - The implementation and ongoing application of our policies, supplier requirements, and contractual controls.
- Our parent company has been a signatory to the UNGC since 2021. The UNGC's assessment framework and reporting/communications mechanism 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>

## 8. PROCESS OF CONSULTATION

We have brought this statement to the attention of our Procurement, ESG & Sustainability, and HR teams. 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.

## 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 continually learn from other organisations and quickly adopt best practices to improve our actions on this topic.

## 10. ENDORSEMENT OF THIS STATEMENT

This statement was approved by the Board of Algeco UK.

Signed by:  
  
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Henrik Akerson

Managing Director

Algeco UK Limited

...26... June 2026

## APPENDIX: Compliance with Modern Slavery Act 2015 Reporting Requirements

The table below cross-references the content of this Modern Slavery Statement against the reporting areas recommended under Section 54(5) of the Modern Slavery Act 2015, demonstrating how Algeco UK has addressed each disclosure area.

<b>Modern Slavery Act 2015 Reporting Requirement</b>	<b>Reference in this Statement</b>	<b>Page</b>
Organisational structure, its business and its supply chains (section 54(5)(a) of the Act)	Section 2	1-2
Organisational policies (section 54(5)(b) of the Act)	Section 3	2-3
Assessing and managing risk (section 54(5)(d) of the Act)	Section 4	3-4
Due diligence in relation to modern slavery (Section 54(5)(c) of the Act)	Section 5	4-5
Training (section 54(5)(f) of the Act)	Section 6	5
Monitoring and evaluation: understanding and demonstrating effectiveness (section 54(5)(e) of the Act)	Section 7	5-6
Board approval	Section 10	6
Director signature	Section 10	6
Date of approval	Section 10	6