

Modern Slavery Statement (Version 1.1, April 2025)

Introduction

This is Modern Slavery and Human Trafficking Statement of Octavius Infrastructure Limited. It is published in accordance with section 54(1) of the Modern Slavery Act 2015 (the Act).

Whilst Octavius Infrastructure's projects are UK based, we recognise that Modern Slavery is not an issue that is restricted to projects overseas. Modern Slavery exists in the UK and supply chains extend globally.

Octavius is committed to taking appropriate and proportionate steps to ensure that no form of modern slavery is connected to our business and our supply chain. This zero-tolerance policy is outlined in our Modern Slavery Policy.

We have been reviewing and enhancing our approach to Modern Slavery since the introduction of the Act. In 2016, we engaged an external consultant to run a Modern Slavery training and risk assessment workshop with key stakeholders from our Business. This assisted in identifying areas to consider, and strengthened our compliance programme.

- The establishment of an Ethics Committee, to deal with all ethical issues, including modern slavery.
- The development of digital right to work checks on our sites, currently being tested on select sites.
- Engagement with the Institute of Business Ethics and the Supply Chain Sustainability School.
- Pre-qualification tools, through Constructionline, were implemented in 2017, and are now fully rolled out for supply chain partners and contractors.





About Octavius Infrastructure Limited

From our beginnings as a small civil engineering contractor in 1966 to our acquisition by Sullivan Street Partners in September 2021, we have always focused on delivering a great service to our customers. We collaborate with our customers, integrate our suppliers and develop our people to deliver assured, sustainable and efficient transport outcomes.

Our focus is firmly on the Rail and Highways sectors where we have proven experience and expertise, as we do in the delivery of transport hubs including car park solutions. The work we do underpins much of what we take for granted in the UK: safe, efficient transport networks. Working closely with our customers and our partners, we help keep the trains running and traffic moving on our roads.

Our success is based on bringing together aligned people from our customers, our suppliers and within our own business; people that share our core values, our collaborative behaviours and have a proactive approach. We then truly value them and create the environment for us all to succeed together.

We are committed to ensuring everyone who works with and for us is treated with respect and dignity. We are also committed to embracing equality and tackling discrimination in all its forms. Through our commitment, we will ensure that all views are considered and the environment in which we live and work is truly inclusive.

We are incredibly proud of where we have come from, and we're excited about where we're going. Octavius embodies our core foundations, the birth of civil engineering in this country and a legacy of effective, progressive and sustainable leadership. It also reflects that ours is the 8th business to join the Sullivan Street portfolio. In Octavius you will see continuity in our people, our values, our principles and how we care and deliver great service.

Our Values

Our approach to eradicating Modern Slavery is influenced by our core values of quality, integrity, openness, being caring and progressive. Our values remain unchanged from our heritage. They form our essence; our heart and they shape our conduct.



Quality

Being professional, setting high standards, and working with pride in what we do.



Openness

Being transparent and authentic, always prepared to listen to others.



Progressive

Being innovative, continually learning, adapting and improving to be the best we can be.



Integrity

Being honest, straightforward and treating others as you would expect to be treated.



Caring

Being kind, encouraging, supporting, respectful and inclusive of each other.

We are committed to ensuring everyone who works with and for us is treated with respect and dignity. We are also committed to embracing equality and tackling discrimination in all its forms. Through our commitment, we will ensure that all views are considered and the environment in which we live and work is truly inclusive.



Octavius Infrastructure is moulded out of a strong sense of respect and dedication to our customers. We are driven by our values to have a positive impact on the environments we exist in. Therefore, it is important to us to tackle modern slavery as best we can, in the hope of eradicating it for good.

Unfortunately, with an ever-globalising world and the employment market becoming more fragmented, a great number of people are at risk of enslavement and abuse, making our challenge even more imposing. We are determined to work with our supply chain to ensure that everyone involved in our business has the respect and dignity they deserve.”

– John Dowsett , CEO





Our Policies

We maintain the following policies in an effort to combat modern slavery and enhance our compliance programme more generally. Our Modern Slavery Policy is of most direct relevance, however, other policies assist by generally encouraging both ethical practices that are consistent with Our Values and the reporting of breaches of policies / related concerns. Each of these policies are stored on PolicyHub, accessible to all employees.

- Ethics Policy
- Modern Slavery Policy
- SHEQ Policy Statement
- Sustainability Policy
- Reducing Risk under Contract policy
- Whistleblowing Policy
- Equality, Diversity and inclusion policy and approach

Risk Assessment

We engaged with an external advisor to assist with assessing modern slavery risks and to enhance Octavius Infrastructure's policies and procedures.

Human rights abuses can occur at all levels of an organisation, and we have identified that our main area of risk is within our supply chain, which includes agency workers, subcontractors and the supply chain workforce (groundwork's & RC Frame, Steel Frame, Mechanical & Electrical, Curtain Walling, Cladding, Brickwork, Roofing, Scaffolding, Dry lining, Carpentry & Joinery, Architectural Metal, Flooring Finishes). To mitigate these risks, we choose to work with certain contractors / labour providers who have evidenced the implementation of their policies, through right to work checks, site inspections, and any bank account checks undertaken by contractors. We also endeavour to ensure that every supply chain partner is registered and approved through Constructionline, after having evidenced the implementation of their policies. This enables us to assess the most ethical supply chain, and mitigates risk.

Supply chain due diligence

We recognise the immense importance and value of our collaborative working relationships with our supply partners to combat modern slavery. Our supplier strategy has been to develop an Octavius Infrastructure supply chain community that shares our company values, as well as promoting and visibly demonstrating these values through behaviours at both a corporate and individual worker level. We endeavour to nurture relationships that encourage our subcontractors and suppliers to adopt our company values and are committed to the highest standards of business ethics, quality and safety performance to help us achieve our business outcomes. We have a structured list of strategic, preferred and approved Supply Chain Partners to assist our efforts in this area.



Due diligence

Part of our approach to identifying and selecting supply partners is a pre-qualification questionnaire. We are enhancing this by solely using Constructionline as a pre-qualification checking method, in order to strengthen the due diligence process and further reduce this risk of Modern Slavery in our supply chain.

Learning and Awareness

We are a partner of the Supply Chain Sustainability School and a supporter of the Institute for Business Ethics. This has enabled us to draft new modern slavery e-learning, which we are looking to roll out in the coming financial year .

Our zero tolerance approach to modern slavery has been promoted in the financial year through:

- The creation of our Code of Conduct and related promotion throughout our business. The Code of Conduct contains a section on modern slavery.
- A campaign to promote the issue of modern slavery through posters on-site and in our offices,
- Articles in our newsletter, which reaches all Octavius Infrastructure employees, outlining the importance of the eradication of Modern Slavery.
- EDI bitesize and STOPThink! Module including unconscious bias training

Measuring effectiveness

Whilst we have not identified any instances of modern slavery on our sites, we recognise that modern slavery can be hidden in supply chains. Our approach to modern slavery will continue to be reviewed and monitored, including by reference to our Sustainable Procurement Policy and under the oversight of our Ethics Committee. To ensure that our processes are effective, carry out supplier audits and spot check and ensure that we suppliers are registered to construction online gold standard.

Next steps

We understand that modern slavery risks are not static and that more can always be done. We endeavour to continue to mitigate modern slavery risks in the years to come through continually reviewing our approach. **Currently we are working towards:**

- Engagement on the issue with the GLAA (Gangmasters & Labour Abuse Authority) and a leading NGO, Stronger Together.
- Continuing discussion on modern slavery at each of our quarterly Ethics Committee meetings.
- Working towards making our modern slavery communications (posters on-site and in office, both physical and electronic) more inclusive



(multilingual messaging). The communications will also be enhanced through the inclusion of further detail on how to spot red flags and what action to take.

- Expanding due diligence on subcontractors and suppliers and the introduction of related clauses into contracts.
- Continuing to enhance our pre-qualifications tools, right to work checks and recruitment checks.
- Introducing an e-learning module for all Octavius Infrastructure employees, which will be a mandatory part of induction.

To raise concerns:

- Guidance on reporting suspected slavery can be found at the Home Office's website: www.modernslavery.co.uk.
- Suspicions of modern slavery existing or being connected to Octavius Infrastructure's business or supply chain can also be reported to your line manager, any senior leader, the People Team, People Director or to the Ethics Committee.
- Our external whistleblowing hotline 'Protect' is available to you to raise concerns: phone: 0207 404 6609 or email: whistle@protect-advice.org.uk
- National helplines (any language):
 - o Modern Slavery Helpline – 0800 0121700 (24 hours)
 - o GLAA – 0800 4320804 (09:00 – 17:00)
- If you're worried that the individual is in immediate danger, phone 999

John Dowsett – CEO

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