



# Modern Slavery Statement (Version 1.2, May 2026)

## Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by Octavius Infrastructure Limited to prevent modern slavery and human trafficking in our business and supply chain during the financial year ended 31 March 2026.

Although our projects are UK-based, we recognise that modern slavery exists in the UK and across global supply chains.

We take a zero-tolerance approach to modern slavery and are committed to proportionate steps to prevent it in our business and supply chain, supported by our Modern Slavery Policy.

Since the Act came into force, we have continued to strengthen our approach through governance, supplier controls, site checks and awareness activity.

- Ethics Committee oversight of ethical risks, including modern slavery.
- Digital right to work checks on selected sites.
- Engagement with the Institute of Business Ethics and the Supply Chain Sustainability School.
- Constructionline pre-qualification for supply chain partners and contractors.





## About Octavius Infrastructure Limited

Octavius Infrastructure Limited is a UK infrastructure business operating primarily in rail, highways and transport hubs. We work with customers, suppliers and partners to deliver sustainable transport outcomes.

Our work supports safe and efficient transport networks across the UK. Because we operate through projects, subcontracting and labour supply arrangements, we recognise the importance of strong controls to identify and manage modern slavery risk.

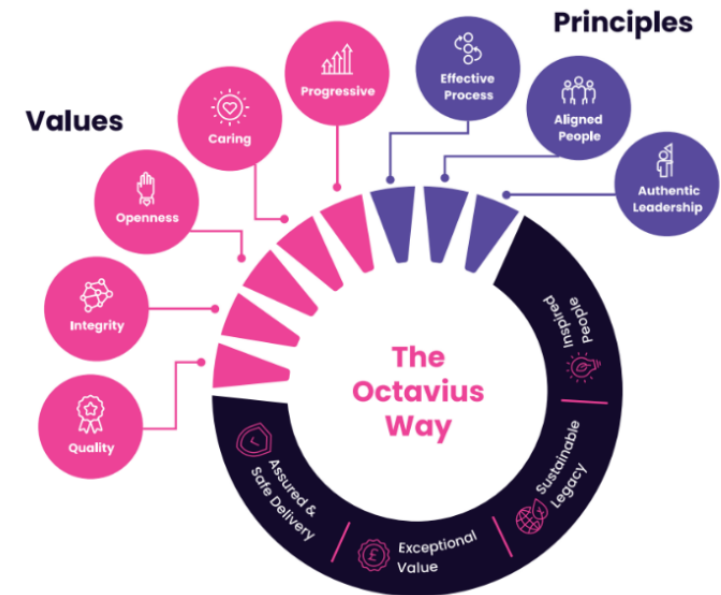
We work collaboratively with customers, suppliers and our own people, and expect those working with us to uphold our standards on integrity, openness and respect.

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.

## The Octavius Way

Our response to modern slavery is guided by The Octavius Way — living our values, upholding our principles and delivering our outcomes. This means acting with integrity, quality, care, openness and progress, and applying the principles of authentic leadership, aligned people and effective processes in how we work with employees, workers, customers and supply chain partners.

We are committed to treating everyone who works with and for us with respect and dignity, creating an environment where people feel safe to raise concerns, and working collaboratively to identify, prevent and address modern slavery risks.





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*Octavius Infrastructure is driven by The Octavius Way. We act with integrity, care and respect, and are committed to preventing modern slavery across our business and supply chain.*

*Modern slavery has no place in our business. We work with our supply chain to protect the rights, dignity and safety of everyone who supports our work.”*

**CEO**

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## Our Policies

We maintain policies that support the prevention, identification and reporting of modern slavery. These are available to employees on PolicyHub.

- 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 have used external support to review our approach and strengthen our policies, procedures and awareness activity.

We recognise the greatest risk is within our supply chain, particularly where agency labour, subcontracting and lower-tier suppliers are involved. Our controls include supplier pre-qualification, right to work checks, site inspections and verification of labour and payment arrangements where appropriate. We also seek to ensure supply chain partners are approved through Constructionline to strengthen due diligence and reduce risk.

## Supply chain due diligence

Modern Slavery compliance forms part of our process for assessing and collaborating with our supply chain partners.

We expect supply partners to meet our standards on ethics, quality and safety. Our strategic, preferred and approved partner model supports due diligence, transparency and longer-term relationships across the supply chain.

## Due diligence

Our due diligence includes pre-qualification of supply partners. We are strengthening this by using Constructionline as our primary pre-qualification route to improve consistency and reduce modern slavery risk in the supply chain.



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### Learning and Awareness

We work with the Supply Chain Sustainability School and the Institute of Business Ethics to strengthen awareness and capability. This has supported the development of modern slavery learning which we plan to roll out more widely.

During the reporting period, we promoted our zero-tolerance approach through:

- Our Code of Conduct, which includes expectations relating to modern slavery.
- Awareness campaigns in offices and on site.
- Internal communications highlighting signs, risks and reporting routes.
- Relevant learning modules and awareness activity for employees and workers.

### Measuring effectiveness and governance

We have not identified any confirmed instances of modern slavery in our operations during the reporting period. We recognise, however, that this risk can be hidden. We therefore review our approach through Ethics Committee oversight, supplier assurance, audits, spot checks and ongoing review of procurement, labour and recruitment controls. Indicators used to assess effectiveness include completion of relevant learning, use of pre-qualification and due diligence checks for supply partners, and findings arising from audits, spot checks and concerns raised.

### Next steps

We recognise that modern slavery risk changes over time and requires continuous improvement. Our current priorities are:

- Engagement with the GLAA and Stronger Together.
- Regular review of modern slavery risks through the Ethics Committee.
- More inclusive and practical modern slavery communications, including red flags and reporting routes.
- Expanded due diligence and stronger contractual controls for suppliers and subcontractors.
- Continued improvement of pre-qualification, right to work and recruitment checks.
- Rollout of modern slavery e-learning, including as part of induction.



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**If you have any concerns and wish to raise an issue,**

- Guidance on reporting suspected modern slavery is available via the Modern Slavery & Exploitation Helpline and GOV.UK.
  - Concerns relating to our business or supply chain can also be raised with a line manager, senior leader, the People Team, the People Director or the Ethics Committee.
  - Our external whistleblowing service, Protect, is available to raise concerns by phone on 020 7404 6609 or by email at [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk).
  - National helplines (any language):
    - Modern Slavery Helpline – 0800 0121700 (24 hours)
    - Fair Work Agency – 0800 4320804 (Monday to Friday, 9am to 5pm)
  - If you're worried that the individual is in immediate danger, phone 999

**Approved by the Board of Directors of Octavius Infrastructure Limited**

**Policy Ref: POL-PPL-024**

**Date of approval: May 2026**

**Review : Annual**