

Modern Slavery and Human Trafficking Statement

At Lindum Group Limited (Lindum) we are committed to taking reasonable steps to ensure that modern slavery and human trafficking is not taking place within our Group or any of our supply chains, in accordance with the Modern Slavery Act 2015.

ORGANISATIONAL STRUCTURE

At Lindum our primary business is construction, including new build, refurbishment and maintenance projects. We also have a range of 'in-house' and 'support services' including plant hire, vehicle maintenance, waste recycling and security. All of our 12 trading divisions operate through one single limited company, Lindum Group Limited.

We have Business Parks in Lincoln, Peterborough and York, a waste recycling site in Saxilby and various construction sites and building and maintenance projects live at any one time, usually within these immediate areas but occasionally further afield, always within the UK.

Lindum employs over 600 individuals directly, and also engages other professionals, sub-contractors and agency workers. Our subcontract and procurement teams work with suppliers who are where possible, local to us and based within the UK, with which we often have a long-term business relationship.

OUR POLICIES

Lindum Group has established organisational systems and controls, overseen by senior management, to ensure that appropriate and coordinated action is taken throughout the business and that slavery and human trafficking is not taking place in our supply chains:

- With our direct employees, we continue to ensure that our recruitment processes are robust and transparent, ensuring identity documents are genuine and remaining vigilant to signs of forced labour.
- We believe respect for workers' rights are the foundation of decent work and we seek to be a good employer. Modern slavery is at the extreme end of the spectrum when it comes to labour standards, and we take seriously our duty to safeguard workers' rights and protections, ensure dignity and autonomy for all and prevent exploitation in all its forms.
- Our policies include our employee code of conduct, subcontract agreements, supplier code of conduct, recruitment (including prohibiting the use of worker-paid recruitment fees), and responsible purchasing practices. All workers are guaranteed the fundamental right to freedom to terminate employment; freedom of movement; freedom of association and collective bargaining. They also include prohibition of any threat of violence, harassment and intimidation; compulsory overtime; child labour; discrimination; confiscation of worker's original identification documents; and access to remedy and justice for victims of modern slavery.
- We have grievance mechanisms in place to ensure our employees and workers within our supply chain can raise concerns and make complaints, including an employee grievance procedure, public and non-employee complaints procedure and whistleblowing procedure. The Company will relay any concerns to a designated organisation or file a report to the Modern Slavery Helpline.

TRAINING & AWARENESS

We have incorporated modern slavery and human trafficking into our training programme, with specific consideration for the ILO (International Labour Office) Indicators of Forced Labour (which are abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, and excessive overtime).

In early 2026, we introduced Modern Slavery 'site packs', equipping site managers and project teams with posters, a toolbox talk guide and other resources. Site inductions also raise awareness of safeguarding and personal safety responsibilities.

RISK ASSESSMENT & DUE DILIGENCE

We acknowledge that statistically construction is one of country's highest risk areas for labour abuse and modern slavery and despite our presence being limited in geographical hotspots, we know that these can happen anywhere.

- *As a targeted response, we conduct social audits on our construction sites. Direct engagement with workers, including agency workers and subcontractors, is one of the most effective ways to verify our suppliers' adherence to ethical labour standards, identify any issues, foster transparency and drive continuous improvement within our supply chain.*

Where we have direct contact with workers, we can be vigilant to signs of abuse and forced labour. However, we acknowledge that our materials procurement supply chain involves greater distance from workers, especially where there are multiple supply chain tiers, in which case we rely heavily on supply chain assurance. We will continue to work with our supply chains to ensure, as far as we are able, that their processes and policies echo our commitment to comply with the requirements of the Act, by:

- *Engaging with our procurement teams to provide bespoke training, review current practices and identify any risk areas and opportunities for improvement. We regularly review agreements we enter into with our supply chains to ensure that our commitment to the requirements of the Modern Slavery Act is clear, along with mutual contractual obligations and expectations.*
- *Proactively undertaking due diligence onboarding checks as well as audits of our suppliers. We also perform more detailed checks where materials may be sourced from outside the UK in countries that have lower human rights standards and higher rates of modern slavery and human trafficking. For example, the UK government recently traced solar panels procured for public-sector contracts to Chinese forced labour, and as up to 80% of the world's renewables are produced in China, more targeted action is taken where suppliers are sourcing higher-risk materials such as PV panels.*

PROGRESS

In 2025, we signed up for the government-backed Modern Slavery Assessment Tool (MSAT). Lindum Group's current score of 74 is considered 'low risk' and indicative of a supplier "that has robust policies, procedures, and actions in place to identify, manage and mitigate modern slavery risk". However we remain committed to regular review and continuous improvement of our measures to ensure ethical labour and resourcing practices within our organisation and the supply chain.

The current Key Performance Indicators (KPIs) used to track, monitor and improve our efforts include:

- Investigating complaints or findings of concern within the timescales set out in the relevant policies and ensuring remediation of any identified issues within 28 days.
- Our MSAT score is a useful indicator of current risk level and we aim to build on progress and increase our score.
- We monitor the percentage of employees trained to identify the signs of modern slavery.
- We annually review the number of supplier audits and social audits (including number of workers interviewed) and number of issues identified and resolved.
- We monitor the number of site packs distributed and toolbox talks undertaken.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Lindum's Modern Slavery and Human Trafficking Statement for the financial year ending 30 November 2025.



Robbie Kok, Director
Lindum Group Ltd
17th April 2026