

MODERN SLAVERY **STATEMENT**

for financial year ended February 2026

2025/26

Contents

Foreword	3	• Labour and recruitment	13
About us	4	• Training and communication	14
Our structure and business	5	Continuing to manage our risk (KPIs)	15
Our policies on slavery and human trafficking	7	Key performance indicators 2026/27	16
Risk management and due diligence processes	8	Further steps	17
• Our supply chain	10		
• Supply chain risk assessment and heat map	12		



Foreword

NG Bailey Group Limited and its subsidiary companies (“the Group”) are committed to conducting business ethically and with full respect for human rights. We maintain a zero-tolerance approach to modern slavery and human trafficking and are dedicated to preventing exploitation in all its forms across our operations and supply chain.

Our commitment is underpinned by our core values of integrity, responsibility, passion and excellence, and reflects our long-standing belief that business should be a force for positive impact. As a family-owned organisation, we are guided by a strong sense of duty to act responsibly and to uphold the dignity, safety and wellbeing of all those connected to our activities.

This Statement is published in accordance with the Modern Slavery Act 2015 and sets out the actions taken during the financial year ended 27 February 2026 to identify, assess and mitigate modern slavery risks within our business and supply chain.

Oversight of our approach is provided through our modern slavery working group, comprising representatives from across the business. This group is responsible for monitoring emerging risks, driving continuous improvement, and embedding effective controls throughout our operations.

During the reporting period, we have continued to strengthen our approach through targeted and measurable actions. These include:

- Undertaking a detailed risk assessment of key areas of our supply chain, enhancing supplier engagement with 31 priority suppliers
- Implementing of a new supply chain management platform to improve risk visibility and due diligence processes

- Advancing our supply chain risk heat mapping, delivering focused supplier workshops, and conducting audits of labour providers to strengthen our oversight in higher-risk areas
- Appointed Align, a specialist Modern Slavery remediation and consulting business to enable best in class updates to internal policies and procedures. Align will also take on an external remediation role when instances of modern slavery are identified, providing support to address, correct, and put right situations where exploitation or harm occurs. This will include working directly with Safecall, our independent whistleblowing helpline and the Speak Up process.

No instances of modern slavery were identified within our operations or supply chain, and no related complaints or grievances were reported during the reporting period.

Developing awareness and capability across our workforce remains a priority. We achieved full completion of modern slavery training for all new starters and delivered enhanced, role-specific training to colleagues with direct responsibility for recruitment and supply chain management.

These actions demonstrate our ongoing commitment to strengthening our systems and controls, supporting our supply chain partners, and ensuring our operations remain free from exploitation. We recognise that addressing modern slavery requires sustained effort and collaboration, and we remain committed to continuous improvement in this area.

This Statement was reviewed and approved by the Board of Directors on 31 August 2026 and signed on its behalf by Jonathan Stockton, Chief Executive Officer.





About us

NG Bailey Group Limited and its subsidiary companies (“the Group”) are the UK’s leading independent engineering and infrastructure services provider, with a heritage dating back to 1921.

We remain a proud family-owned business, employing approximately 3,700 people and operating from a network of offices, sites and manufacturing facilities across the UK.

The Group’s purpose is to create and maintain exceptional buildings and infrastructure that enable a society which connects seamlessly, operates efficiently and prospers now and in the future. We deliver integrated, end-to-end solutions across the built environment and infrastructure sectors, supporting clients from initial concept and design through to manufacture, construction, and ongoing operation and maintenance.

Our capabilities span mechanical and electrical engineering, offsite manufacture, facilities services, digital and IT infrastructure, water and wastewater infrastructure and electricity infrastructure, including low-, high- and extra-high-voltage networks. This breadth of expertise enables us to work across a wide range of sectors, including energy, water, healthcare, education, defence and commercial environments.

We are principally a UK-based organisation, delivering the majority of our services domestically, while also undertaking selected international projects, primarily in Europe. Building strong relationships with our customers, supply chain partners and communities is central to how we operate.

For the financial year ended 27 February 2026, the Group reported turnover of £707 million, reflecting continued growth and strong performance across our core markets. Driven by our core values of passion, integrity, responsibility and excellence, we are committed to operating responsibly and sustainably, using innovation and technical expertise to deliver long-term value for our customers, our people and society as a whole.

Our registered head office is

NG Bailey, Ground Floor (Suite T), ABC Building, White Rose Park, Millshaw Park Lane, Leeds, LS11 0DL



NG Bailey

PASSION | INTEGRITY | RESPONSIBILITY | EXCELLENCE

Our structure and business

NG Bailey has a unique offering with a portfolio of capabilities across engineering infrastructure services.

We focus on recession resilient sectors where we have leading expertise and experience.

The Group primarily consists of three operating divisions, the Built Environment division, Freedom and IT Services.

ENGINEERING

- ✓ Design of complex engineering building solutions
- ✓ Build and installation expertise
- ✓ Offsite Manufacture and Modern Methods of Construction (MMC)
- ✓ Commissioning solutions
- ✓ Water, environmental and wider infrastructure solutions

LOW CARBON

- ✓ EV Infrastructure
Principal contractor, constructing EV charging hubs and infrastructure. Design, installation, commissioning and maintenance of EV charging infrastructure
- ✓ Low Carbon Buildings
Enabling decarbonisation through our low carbon solutions

FACILITIES SERVICES

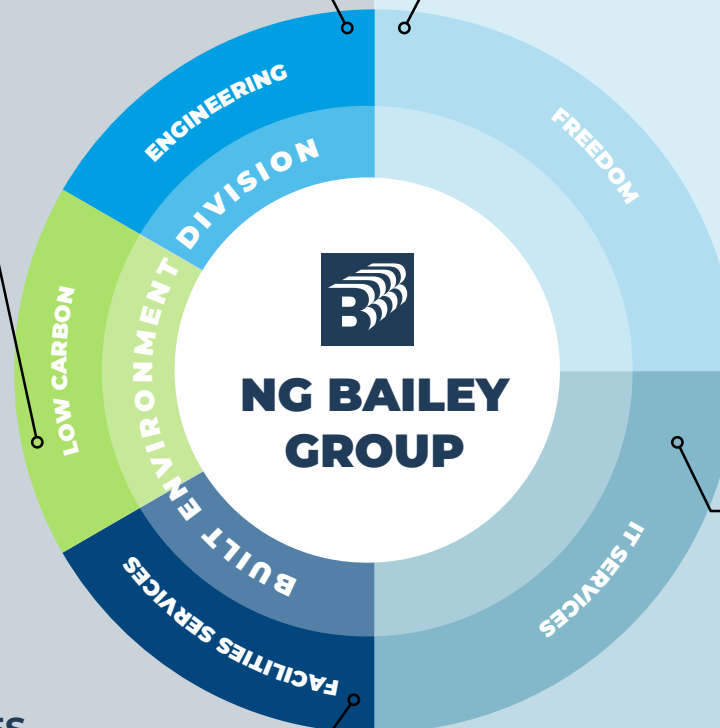
- ✓ Planned and reactive technical services
- ✓ Critical asset management
- ✓ Technical compliance
- ✓ Digital maintenance
- ✓ Energy performance management
- ✓ Project management and delivery

FREEDOM

- ✓ Electrical, civil and structural advisory and design services
- ✓ Power and renewable energy solutions
- ✓ Experts in connection and wholesale markets
- ✓ Overhead and underground power distribution systems
- ✓ Surveys and inspections
- ✓ Infrastructure maintenance and projects

IT SERVICES

- ✓ Critical infrastructure
- ✓ Network services
- ✓ Data cabling





Our structure and business (continued)

The **Built Environment** division serves our customers by leveraging the combined strength and expertise of four businesses:

ENGINEERING (*NG Bailey Limited and OSM Ventilation Limited, our offsite ductwork manufacturer*)

Our Engineering business focuses on the design, manufacturing and build of specialist and market-leading mechanical, electrical and plumbing (MEP) solutions.

The business does this through three distinctive offerings:

- **Design:** through our team of in-house designers, we offer end-to-end design services for our clients across the built environment
- **Manufacturing:** through our world-class offsite manufacturing teams (OSM), we offer prefabricated MEP solutions, ductwork and ventilation and nuclear grade welding facilities
- **Build:** through our team of skilled operatives and trusted supply chain we will build, commission and install leading edge MEP and built environment infrastructure solutions.

FACILITIES SERVICES (*NG Bailey Facilities Services Limited*)

Facilities Services provides mechanical and electrical, planned and reactive integrated building maintenance services. We

focus on Maintaining premium spaces and critical assets, promoting sustainability through engineering excellence and intelligent building management.

LOW CARBON (*Part of NG Bailey Limited*)

The Low Carbon business provides integrated low carbon engineering solutions, combining electric vehicle infrastructure and low carbon building services. The business acts as both an advisor and principal contractor, supporting clients in the decarbonisation of their buildings and transport infrastructure.

ECS (*Engineering Solutions Group Limited and its subsidiaries*)

On 31 March 2026, the Group acquired Engineering Solutions Group Limited and its subsidiaries. The group is collectively referred to as ECS after its main trading company (ECS Engineering Services Limited) and is a specialist engineering group operating across the water, environmental and wider infrastructure sectors.

FREEDOM (*The Freedom Group Of Companies Ltd*)

Freedom designs, installs and maintains electrical infrastructure for UK distribution network operators (DNOs) and the wider utilities sector, supporting the modernisation of the electricity network and the transition to a low carbon future. As a NERS accredited Independent Connection Provider, it delivers end-to-end solutions across the project lifecycle from feasibility and design through to construction and ongoing maintenance providing grid connections from 11kV to 132kV and enabling reliable, resilient infrastructure for complex, large scale projects aligned with the UK's net zero ambitions.

IT SERVICES (*NG Bailey IT Services Limited*)

The principal activities of IT Services are the provision of specialist digital technology solutions, enabling upgrades and innovation across three key areas of customers' digital agendas: critical infrastructure, data cabling, and network services. These services are provided to customers across a number of markets in the public and private sector.



Our policies on slavery and human trafficking

We maintain a zero-tolerance approach to modern slavery and human trafficking in all areas of our business and supply chain. Our Anti Slavery and Human Trafficking Policy (available on our website www.ngbailey.com) applies to all employees, contractors and third parties acting on our behalf and is regularly reviewed to ensure it remains clear, accessible and aligned to current expectations and best practice.

This policy underpins our commitment to conducting business ethically and with integrity, supported by robust systems and controls designed to identify, prevent and mitigate the risk of modern slavery. It is publicly available on our website, alongside a suite of supporting policies that reinforce our approach, including our:

- Speak Up Policy
- Code of Integrity for Employees
- Codes of Integrity for Business Partners
- Ethical Working Policy
- Group Responsibility Policy

Together, these policies set out the standards we expect of our people and supply chain, and promote a culture in which concerns can be made in good faith, confidently and without fear of retaliation. Our independent whistleblowing helpline, Safecall, is available to employees and third parties to report any concerns, including potential instances of modern slavery.

During the reporting period, no instances of modern slavery were identified within our operations or supply chain, and no related complaints or grievances were reported. We remain committed to maintaining vigilance and encouraging openness as part of our ongoing efforts to prevent exploitation.



Risk management and due diligence processes

Our modern slavery working group has continued to meet throughout the year working collectively across the Group to implement change and drive progress across four key workstreams:

- **Governance and due diligence** (pages 8 to 9)
- **Supply chain** (pages 10 to 12)
- **Labour and recruitment** (page 13)
- **Training and communication** (page 14)

Risk management

The Group operates a structured risk management framework to identify, assess and manage risks that could impact the delivery of its strategic objectives. Risk registers are the primary mechanism through which this framework is applied, capturing risk exposure through defined assessments of likelihood and impact, alongside the controls in place to reduce risks to an acceptable level.

Risks, including those relating to modern slavery, are managed through a tiered hierarchy of risk registers including the following:

- Board
- Group Leadership Team (GLT)
- Divisional and functional
- Projects

This integrated top-down and bottom-up approach supports consistent oversight, enabling risks to be both escalated and cascaded effectively, while providing a consolidated view of the Group's overall exposure, including modern slavery risk.

As a business operating within the construction sector, we recognise the heightened risk of modern slavery and labour exploitation inherent in our industry. These risks are driven by factors such as skills shortages, complex multi-tiered supply chains, and the use of indirect and self-employed labour. While we are confident in our control environment, we are mindful of the challenging operating context and remain committed to continuously strengthening our approach to uphold high ethical standards and protect human rights across our operations and supply chain.

To support a coordinated industry response, we actively participate in the Supply Chain Sustainability School's Built Environment Against Modern Slavery working group. This collaboration enables cross-sector engagement to identify emerging risks, share best practice and strengthen collective action. Our involvement reflects our commitment to transparency and continuous improvement, aligned with the expectations set out in the UK Government's modern slavery reporting guidance.



Governance and due diligence

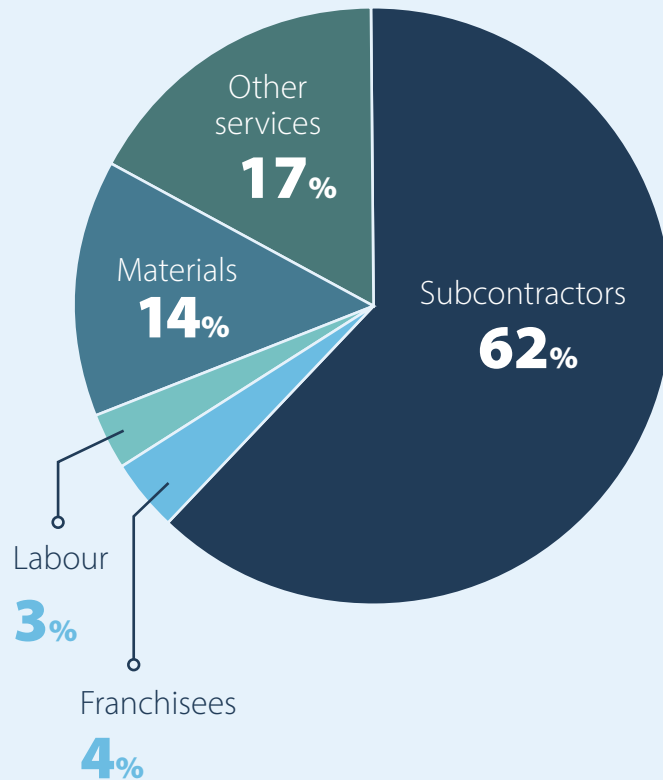
This statement meets UK Government expectations under the Modern Slavery Act 2015 and aligns with the Transparency in Supply Chains (TISC) guidance. It outlines robust governance, risk assessment and due diligence across our operations and supply chain, supported by our partnership with Align to embed a more victim centred approach to remediation and escalation. Through incorporating survivor informed expertise, strengthening reporting and whistleblowing channels, and embedding lived experience led procedures, we are progressing beyond compliance towards a more effective human rights due diligence framework. Since the last report, we have taken a series of targeted actions to strengthen governance, supplier oversight and independent, survivor informed remediation, including:

- Within the reporting year our modern slavery working group continued to meet on a regular basis. Progress was reported to our Responsibility and Impact steering committee and a further update was provided to our Audit & Risk Committee during the reporting year
- During 2025/26, we partnered with Align, an ethical consultancy specialising in modern slavery and informed by lived experience consultants, to enhance our support for potential victims and strengthen the maturity of our approach. Align confirmed that we have a well-developed understanding of our key risk areas and recent labour provider audits have reinforced confidence in provider practices. Align has undertaken extensive stakeholder engagement across the group and is working with operational teams to identify where existing processes and procedures can be strengthened to improve visibility and risk identification
- We have strengthened our governance framework by appointing Align as our independent remediation provider, supported by accessible reporting channels via Safecall, our independent whistleblowing provider. In partnership with Align, we have reviewed and aligned escalation processes to ensure a consistent, timely and effective response to potential modern slavery risks. As our independent remediation provider, Align provides expert guidance, supports early risk assessment, and maintains oversight through case tracking and reporting. Where potential victims are identified, Align will lead a coordinated response and deliver tailored remediation, improving accountability and ensuring clear communication of our processes to stakeholders
- As part of our strengthened internal escalation procedures in partnership with Align, we are introducing an enhanced audit protocol and revised framework. The procedure applies to all employees and ensures that any suspected modern slavery concerns are reported via Safecall, enabling timely coordination and response by the NG Bailey team. The revised procedure will be implemented in FY27, reinforcing robust governance and effective risk management
- To ensure we continue to manage modern slavery risk appropriately, we have developed an early risk indicator assessment in partnership with Align. The assessment is designed for use during audit to help determine whether further action is required and will be applied in accordance with the audit protocol and escalation procedure



Our supply chain

The Group's supply chain



Representation of our supply chain expenditure, based on full financial year spend for the 2025/26 reporting period

Our Group works with approximately 3,100 suppliers, supporting both our operational businesses and Group functions.

The majority of our Tier 1 (direct) supply chain is based in the UK. We also procure goods and services from the EU and other regions on an ad hoc basis to meet specific contractual and client requirements. In some instances, clients provide goods to us on a free-issue basis and therefore we recognise that our wider supply chain extends globally.

Our supply chain comprises a diverse range of organisations, including large multinational companies, which account for approximately 30% of our total spend, and small and medium-sized enterprises (SMEs), which account for around 70%. While our supplier base is broad, our expenditure is concentrated, with approximately 13% of suppliers accounting for 80% of our total spend. This concentration enables us to focus our due diligence and risk management efforts on those suppliers with the greatest potential impact.

Risk management and supplier onboarding

We are committed to identifying, assessing and addressing the risk of modern slavery and human trafficking across all levels of our supply chain. During the year, we implemented a new supply chain management platform designed to enhance supplier risk management, improve transparency and streamline our internal processes.

All suppliers are required, through our online pre-qualification process, to agree to the principles set out in our Code of Integrity for Business Partners. This includes commitments to operate ethically and to take appropriate measures to prevent slavery and human trafficking within their own operations and supply chains.

As part of this process, new suppliers must provide information and supporting evidence outlining their approach to managing modern slavery risks. Where suppliers are legally required to publish a Modern Slavery Statement under the Modern Slavery Act 2015, we request that they provide a copy as part of our onboarding process.

Ongoing monitoring and industry engagement

We continue to engage with our supply chain at the pre-construction stage to ensure alignment with our standards, expectations and working practices.

For existing suppliers, we operate an ongoing programme to refresh supplier information. This requires suppliers to reaffirm their commitment to our Code of Integrity for Business Partners and to demonstrate continued alignment with our expectations. Where a supplier does not meet these requirements, we engage directly with them and undertake a risk-based assessment of their policies and controls before any work is authorised.

We undertook a detailed review of modern slavery risks for our most material suppliers to improve our understanding of our risk profile. The review utilised information sourced from the Global Slavery Index supported by sourcing information from our suppliers and procurement teams.

We also remain an active participant in the Built Environment Against Modern Slavery group, supporting cross-industry collaboration to raise awareness, share best practice and strengthen collective action to address modern slavery risks.



Our supply chain (continued)

Payment practices

We recognise that financial pressures within supply chains, including delayed payments, can increase vulnerability to modern slavery. Payment performance within our sector can be complex due to multi-tiered supply chains, contractual arrangements and dispute resolution processes. Despite these challenges, we continue to maintain industry-leading performance.

In 2025/26, 99% of invoices were paid within 60 days (2024/25: 99%), representing an improvement of 40% since 2019. Payment performance is closely monitored and regularly reported to the Board and the Audit & Risk Committee.

We continue to invest in digital procurement systems to improve the speed, accuracy and transparency of invoicing and payment processes. In addition, we operate the Earlytrade platform, which provides our Engineering subcontractors with the option to access early payment in exchange for a small discount. By the end of 2025/26, almost £8 million had been processed through the platform since its inception, with

usage increasing by 160% during the year. Participation is voluntary, and the platform does not involve bank financing or changes to agreed contractual payment terms.

Policies, controls and continuous improvement

During 2025/26, we updated our standard trading terms, commercial agreements and subcontract conditions. These incorporate provisions requiring our supply chain to align with our zero-tolerance approach to slavery and human trafficking and to comply with the Modern Slavery Act 2015. Our standard working practices also prohibit cash payments across our supply chain, supporting transparency and traceability.

To strengthen assurance, we are implementing a programme of regular supplier audits, which has been embedded as a key requirement within our updated contractual framework. This will further support ongoing monitoring of supplier compliance and drive continuous improvement in supply chain standards.

Supply chain risk assessment and heat map

Our Tier 1 supply chain consists primarily of UK domiciled companies, although in some cases their parent organisations are registered overseas. Beyond this, our Tier 2 supply chain, comprising suppliers to our direct suppliers, is more geographically diverse, with products sourced from the UK, Europe and international markets, including the Asia Pacific region, the Middle East and the Indian sub continent. We recognise that this extended and globalised supply chain presents varying levels of modern slavery risk.

We continue to actively review and strengthen our approach to identifying and managing modern slavery risks across our supply chain. During 2025/26, we enhanced our risk assessment processes through the introduction of a detailed modern slavery questionnaire. This was issued to suppliers identified as presenting a potentially higher risk, particularly in relation to the use of migrant labour. The initial results of this exercise have been used to refine our risk profile (as shown to the right) and inform our developing approach to supplier engagement in higher risk regions. This work is being undertaken in collaboration with Align, supporting a consistent and informed approach across the Group.

Our current focus is on our most material product suppliers and subcontractors, reflecting both spend concentration and potential exposure to higher risk activities. In assessing risk across these categories, we have adopted a structured and evidence based approach including:

- For our product and materials supply chain, we have considered both Tier 1 and Tier 2 sources, adopting the Global Slavery Index heat mapping methodology
- For our subcontractors, we have undertaken risk assessments identifying those sub-categories of supply that could be considered more likely to be engaged in the employment of migrant labour
- During 2025/26 we have undertaken follow up due-diligence auditing with approximately 30% of the supply chain identified as potential higher risk
- 25% of our supply chain (by spend) has undertaken modern slavery training via the Supply Chain Sustainability School (or equivalent), an independent organisation that provides training and resources to improve sustainability practices.



GSI assessment score

- **60-100** Follow up action requested
- **40-59** Investigate
- **31-39** Monitor – risk of slipping into amber
- **0-30** Low risk

Labour and recruitment

Our integrated HR, payroll and learning management system, Dayforce, underpins a transparent, consistent and controlled approach to recruitment, onboarding and workforce management across the Group. This is supported by robust policies and controls that mitigate risk and enable ongoing compliance monitoring including:

- **Right to Work compliance:** Our UK Recruitment and Selection Policy, offer letters and contracts require all applicants to provide valid proof of their Right to Work in the UK, in line with the Immigration, Asylum and Nationality Act 2006 and Home Office guidance. Accountability sits with both recruiting managers and the People Services team, ensuring consistent application of requirements
- **Identity (ID) verification controls:** We use TrustID, a certified digital identity service provider, to conduct secure Right to Work checks. This is supplemented by mandatory visual ID checks undertaken by recruiting managers. Where digital verification is not possible, manual checks are conducted in person, with documentation reviewed, copied and centrally stored. Completion of these checks is recorded and confirmed within Dayforce, creating a clear audit trail.
- **Overseas recruitment governance:** Recruiting managers work closely with People Services to ensure compliance with immigration requirements. While we hold a sponsorship licence, its use is restricted to eligible roles, and all associated Home Office reporting and compliance obligations are actively managed
- **Ongoing monitoring and review:** Home Office online checks are carried out where required, including for EU nationals and individuals with biometric residence permits. Employees with time-limited Right to Work status are centrally tracked, with monthly review processes in place to confirm continued eligibility to mitigate risk of non-compliance
- **Pre-employment screening:** Additional checks, including references, qualifications and National Insurance verification are conducted where appropriate to validate candidate credentials and identity. Any discrepancies are investigated and escalated in line with defined procedures
- **Employee payments:** All employee payments are made exclusively via direct bank transfer to accounts authorised by the individual, eliminating the risks associated with cash or cheque payments. Employees manage their personal and banking details securely through the password-protected self-service function within Dayforce, ensuring data integrity, control and auditability.

Temporary labour

Where temporary labour is engaged, risks are mitigated through robust contractual controls requiring third-party agencies to comply with all applicable legislation, including modern slavery requirements. We also set clear expectations with clients where we operate under third-party contracts to ensure alignment on prevention standards.

Compliance is monitored through supplier assurance activity for temporary agency resource across the Group. This includes audits of agency labour providers conducted by either independent vendor managed service providers or members of our HR team, utilising a series of questions and checks developed by Internal Audit.

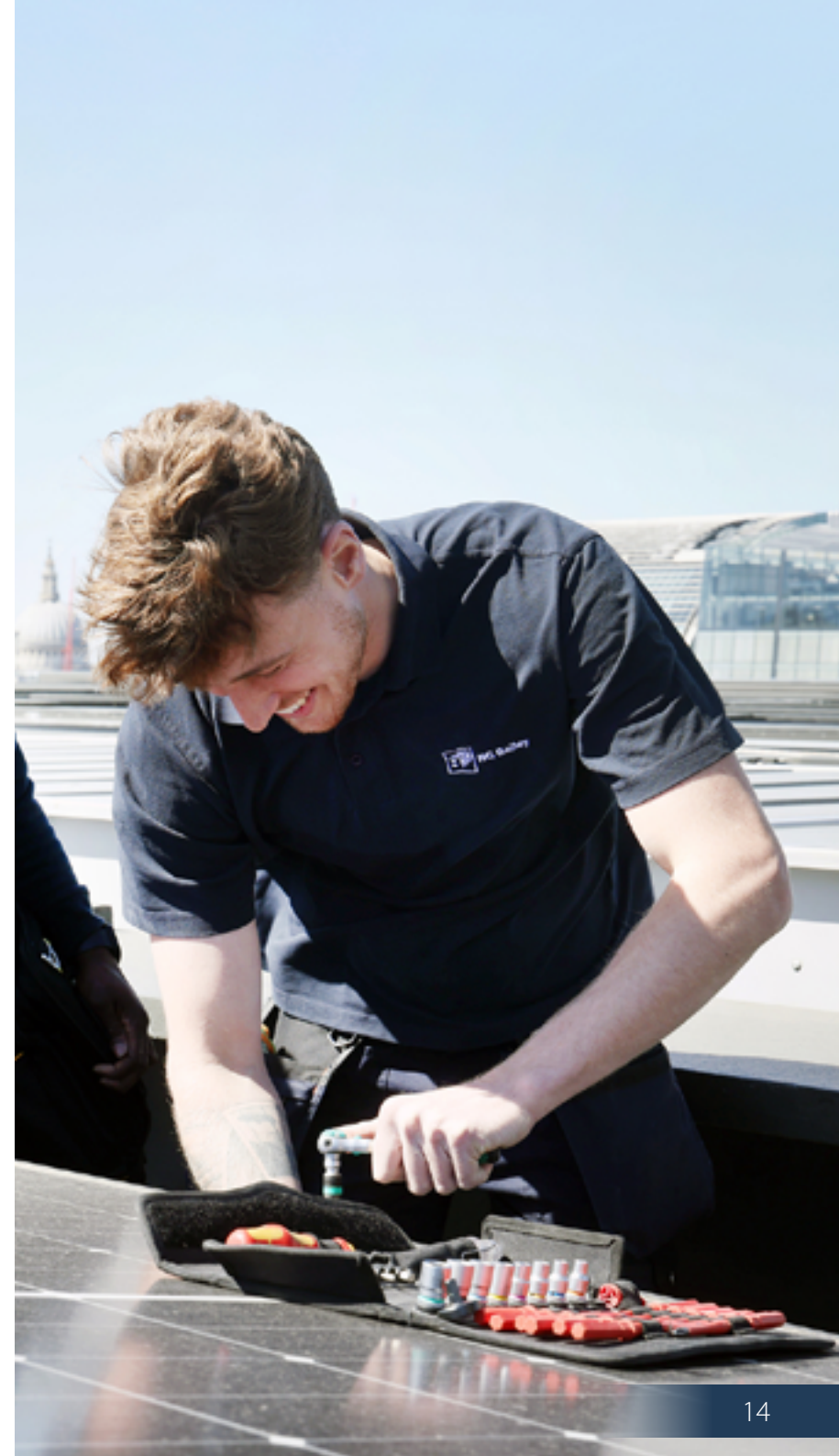
A focus for 2026/27 is to establish other methods of engagement and feedback with workers in addition to existing employee surveys and forums.

In 2025/26, we audited 100% of our temporary agency labour and resourcing suppliers which working alongside our Engineering, Freedom, Facilities Services and IT Services businesses with no material concerns identified

Training and communication

We are committed to improving the awareness and understanding of modern slavery across the Group and in the reporting year we took steps to ensure:

- Key teams that have direct influence over our recruitment and supply chain engagement have completed appropriate training. 100% of our Resourcing Team has completed modern slavery training, and all employees in roles that influence buying decisions or spending have completed enhanced modern slavery training within the year. The training addressed topics relating to the Modern Slavery Act 2015, requirements for modern slavery disclosures and supply chain mapping
- All new employees completed modern slavery e-learning
- A Modern Slavery “Toolbox Talk” has been made available on our internal intranet, equipping line managers to deliver consistent awareness training on modern slavery risks to site-based staff
- We remain committed to equipping employees to identify and report suspected modern slavery. Following review by Align, our 2026/27 focus is on practical measures to build confidence and capability, particularly among frontline roles such as site supervisors and operational staff. Using the “Spot the Signs” campaign to enhance awareness, tools and guidance for these teams will strengthen ownership and support more effective identification and reporting of risks across the business
- We have incorporated a detailed case study scenario into our People Leader Programmes, which is the core internal training programme for NG Bailey people leaders at first, mid and senior levels. This scenario-based approach enables learners to practice and develop skills as part of the crucial conversations section. Facilitated conversations on potential warning signs support the identification and understanding of appropriate actions
- Modern slavery awareness is included in our apprenticeship induction programme. Each apprentice receives a pocket guide as part of their induction pack. Additionally, we integrated a scenario-based activity into our Year 2 development day for all early career apprentices. Each year, we publish an early careers bulletin to raise awareness of modern slavery



Continuing to manage our risk - key performance indicators (KPIs)

Our modern slavery working group set key performance indicators (KPIs) for the 2025/26 year. We are pleased to report strong progress, with the "Spot the Signs" campaign underway and progressing towards full rollout in 2026/27, and all other KPIs met.

We recognise the importance of continuing to build on this progress. As a result, we have set new KPIs for 2026/27 (set out over the page) to drive further progress and encourage continuous improvement.



Achieved



Underway and ongoing



Requires further development / consideration

Workstream	2025/26 KPI	Status
Governance and Policy	Appoint an independent remediation provider to support potential victims and communicate our remediation process to all stakeholders	
Governance and Policy	Review the internal escalation procedure for the Group to address cases of suspected modern slavery	
Governance and Policy	Enhance and update existing governance training to ensure continued comprehensive coverage of modern slavery and related ethical practices.	
Governance and Policy	Enhance our approach to modern slavery risk assessments, building on the existing supply chain heat maps in place.	
Training and communication	Roll out the "Spot the Signs" campaign to enhance front-line colleagues' understanding of what modern slavery is and what it isn't.	
Training and communication	Increase participation in modern slavery training among site-based staff by providing line managers with the tools to deliver a 'Toolbox Talk'.	
Training and communication	Monitor and maintain 100% completion of modern slavery e-learning for all new starters and actively drive completion among all relevant, active employees.	
Supply Chain	Incorporate registration with the Supply Chain Sustainability School as part of our supply chain onboarding process for suppliers with whom we have on-going trading relationships.	
Supply Chain	Define a tiered risk based modern slavery learning pathway for our preferred suppliers and target 25% of preferred suppliers having commenced on their learning pathway during the year.	
Supply Chain	Establish a plan to review the material suppliers sourcing from Global Slavery Index (GSI) 'high risk' countries as identified in our heat mapping process.	
Supply Chain	Define an audit programme to conduct further due diligence for subcontractors identified as having a potentially higher probability of exposure to use of migrant workforce	
Labour and recruitment	100% of temporary agency suppliers audited within the reporting year	

2026/27

Key performance indicators

Supply chain

- Ensure 100% of all new suppliers sign up to our Code of Integrity for Business Partners.
- Conduct further risk based due diligence on the supply chain identified as being high risk from the 2025/26 review
- Continue a tiered risk based modern slavery learning pathway for our preferred suppliers and target at least 30% (by spend) of preferred suppliers having commenced on their learning pathway during the year

Labour and recruitment

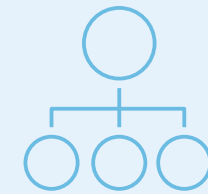
- 100% of temporary agency suppliers are audited within the reporting year
- Review worker engagement methods and feedback mechanisms across the Group

Training and communication

- Roll out the “Spot the Signs” campaign to enhance front-line colleagues’ understanding of what modern slavery is and what it isn’t.

Governance and policy

- Implement the revised escalation procedure across the business
- Conduct at least one annual test or simulation of escalation procedures to validate effectiveness.
- Ensure all reported concerns are logged, tracked and closed, with documented outcomes and oversight via Align.



SUPPLY CHAIN



LABOUR AND RECRUITMENT



TRAINING AND COMMUNICATION



GOVERNANCE AND POLICY



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ended 27 February 2026.

Further steps

We maintain a zero-tolerance approach to modern slavery and human trafficking in our supply chain or any part of our business and will be taking further steps throughout the upcoming year.

These will include but are not limited to the following:

- Maintaining the modern slavery working group with each key workstream developing strategic areas of focus for the next 1-2 years
- Monitoring our performance against the KPIs included in this report and communicating to the business where performance needs to be strengthened
- Communicating more frequently, with empathy and respect, and in different languages to increase visibility of modern slavery risk across our business and supply chain
- Remaining committed to on-going investment in technology to support supply chain improvements.
- Engaging further with independent third parties to increase visibility of best practice and benchmarking in relation to our modern slavery approach





NG Bailey Group Limited

Registered office:

NG Bailey, Ground Floor (Suite T),
ABC Building, White Rose Park,
Millshaw Park Lane, Leeds, LS11 0DL

www.ngbailey.com



PASSION | INTEGRITY | RESPONSIBILITY | EXCELLENCE