



NG Bailey

MODERN SLAVERY STATEMENT

for financial year ended February 2025



PASSION | INTEGRITY | RESPONSIBILITY | EXCELLENCE

2024/25

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Foreword

NG Bailey Group Limited and its subsidiary companies (“the Group”) are fully committed to conducting our business ethically and with the utmost respect for human rights. Guided by our values of passion, integrity, responsibility, and excellence, we maintain a zero-tolerance stance against modern slavery and human trafficking throughout our operations and supply chain.

This commitment reflects our dedication to creating workplaces and business practices that promote human dignity and prevent exploitation in any form. As a family-owned business, our heritage and values shape our business approach and drive our motivation to positively contribute to society. We are dedicated to creating exceptional environments for both present and future generations, with a strong emphasis on ethical practices.

This Statement has been published in accordance with the Modern Slavery Act 2015 (“the Act”) and sets out the steps we have taken to prevent modern slavery and human trafficking in our supply chain for the financial year ended 28 February 2025.

We currently manage risk and disclosure obligations through our Modern Slavery Working Group - an assembly of subject matter experts, each bringing distinct expertise from different functions of the business. Together, they monitor risks and champion progress within their individual areas of specialisation.

During the year:

- We undertook a detailed desktop review of modern slavery risks for our most significant supply chain

providers and subsequently identified and engaged further on this topic with 31 suppliers (representing £108m of spend)

- We began introducing a new supply chain management platform to improve supplier risk management and streamline our processes
- Our proactive measures to address supply chain risk, such as heat mapping our supply chain, auditing resourcing suppliers and delivering workshops on how to combat modern slavery risks, serve as a substantial safeguard and have strengthened our ability to identify and mitigate potential risks related to modern slavery in our supply chain
- We have modern slavery employee training programmes in place. We achieved 100% completion of modern slavery training for new starters and provide targeted enhanced training for teams with direct influence over recruitment and the supply chain

These initiatives reflect our dedication to support our business operations to achieve our goals of ethical practices, respecting human rights, and ensuring that our business operations remain free from exploitation.

This statement was reviewed and approved by our Board of Directors on 14 August 2025 and was signed on behalf of the Board by Jonathan Stockton, Chief Executive Officer. It was also reviewed and approved by the Audit and Risk Committee.





About Us

We are the largest independent provider of engineering and infrastructure services in the UK.

Our unique offering provides true end-to-end solutions that cover the whole built environment. From initial project concept, through our design, build, manufacture and maintain offering, and digital infrastructure and sustainable electricity infrastructure capabilities, we deliver innovative solutions across our chosen sectors. Our capabilities are set out on page 5.

We are principally a UK-based business with a footprint across the UK. Whilst the majority of our services are delivered on projects in the UK, on occasion, we also operate internationally with projects and teams based overseas, most often in Europe.

We employ approximately 3,500 people within the Group, with an annual turnover in 2024/25 of £662m.

Our registered head office is

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



NG Bailey's Structure and Business

From 1 March 2025, we transitioned from the previous Engineering and Services divisional model to a new 'Built Environment division' that operates alongside our Freedom and IT Services businesses. The diagram to the right sets out our management structure along with our core capabilities.

The NG Bailey group is made up of the following trading companies:

- NG Bailey Group Limited (parent company)
- Built Environment division:
 - NG Bailey Limited (Engineering and Offsite Manufacture businesses)
 - OSM Ventilation Limited*, our offsite ductwork manufacturer
 - NG Bailey Facilities Services Limited (includes EV Infrastructure business)
- The Freedom Group of Companies Ltd.
- NG Bailey IT Services Limited

* A new company incorporated on 26 February 2025

ENGINEERING

- ✓ Design of complex engineering building solutions
- ✓ Build and installation expertise
- ✓ Offsite Manufacture and Modern Methods of Construction (MMC)
- ✓ Commissioning solutions.

EV INFRASTRUCTURE

- ✓ Principal contractor, constructing EV charging hubs and infrastructure
- ✓ Design, installation, commissioning and maintenance of EV charging infrastructure.

FACILITIES SERVICES

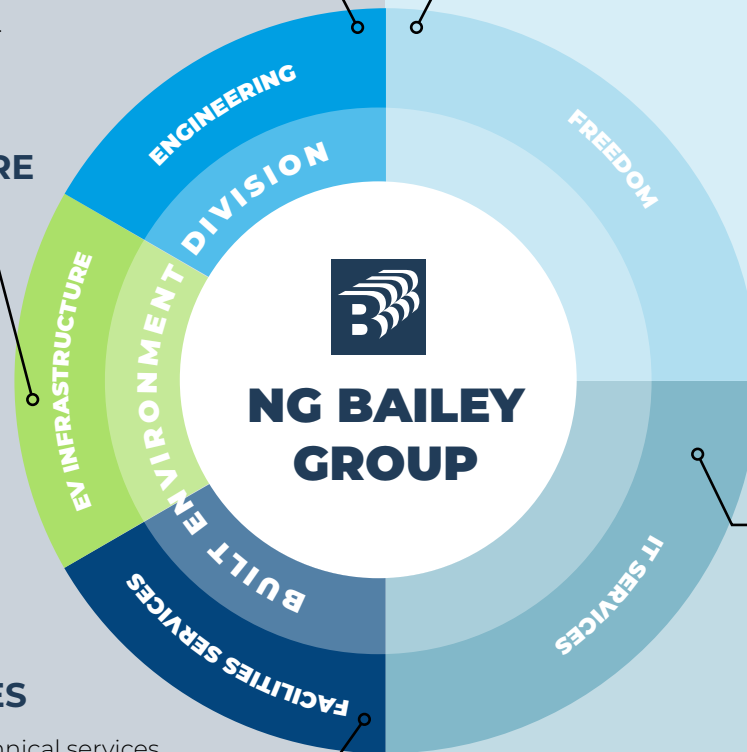
- ✓ Planned and reactive technical services
- ✓ Critical asset management
- ✓ Technical compliance
- ✓ Digital maintenance
- ✓ Energy performance management
- ✓ Project management and delivery.

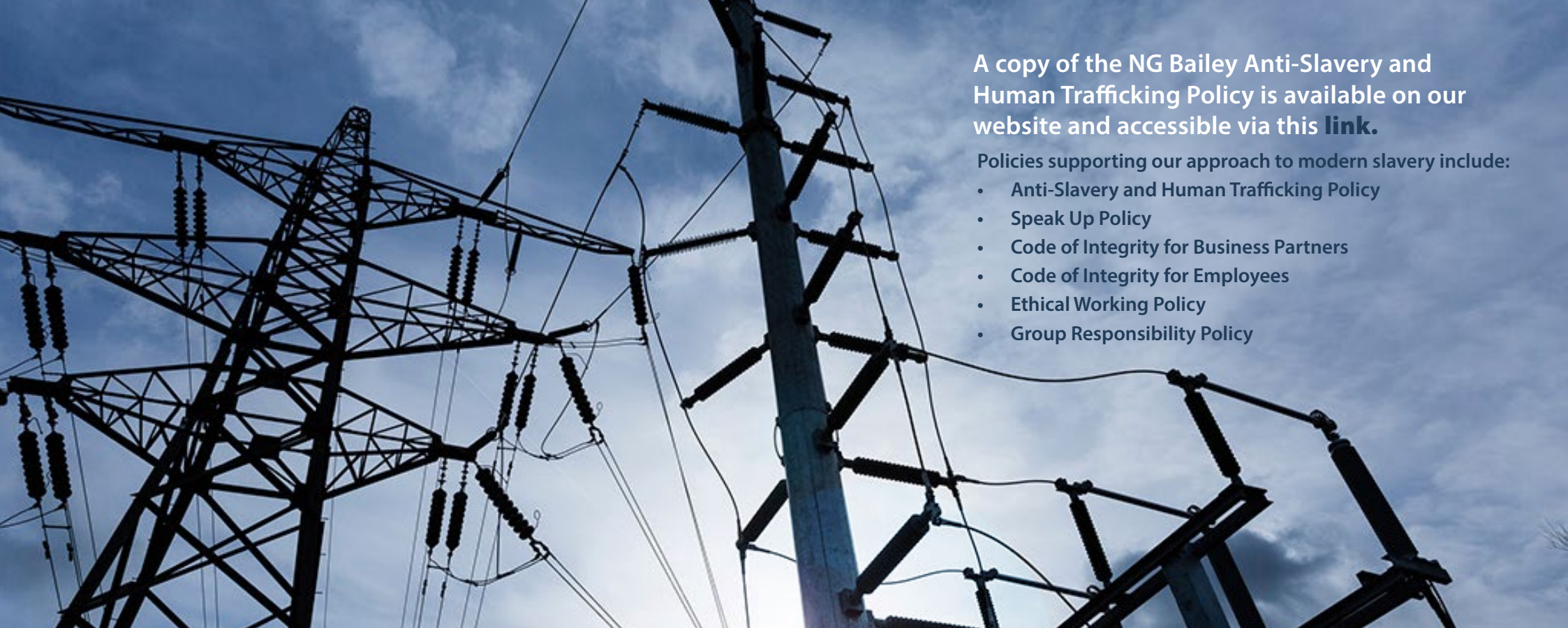
FREEDOM

- ✓ 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

- ✓ IT connectivity solutions
- ✓ Network services
- ✓ Data centre solutions
- ✓ Cloud connect services
- ✓ Electronic security
- ✓ Structured cabling
- ✓ Unified communications.





A copy of the NG Bailey Anti-Slavery and Human Trafficking Policy is available on our website and accessible via this [link](#).

Policies supporting our approach to modern slavery include:

- Anti-Slavery and Human Trafficking Policy
- Speak Up Policy
- Code of Integrity for Business Partners
- Code of Integrity for Employees
- Ethical Working Policy
- Group Responsibility Policy

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no slavery or human trafficking in our supply chain or in any part of our business.

Our Anti-Slavery and Human Trafficking Policy applies to all those who work in any capacity for us, or on our behalf and in the reporting year we took steps to revise the policy content to ensure expectations were clear, concise and accessible.

Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and implements and enforces effective systems and controls to support our goal of ensuring slavery and human trafficking do not take place in our supply chain and business.

To reinforce our commitment, we also make available to all stakeholders via our website www.ngbailey.com, our Code of Integrity for Business Partners, our Ethical Working policy, our Group Responsibility policy and our Speak Up policy. Our **Speak Up Hotline** is available to employees and third parties to report any concerns, including any related to modern slavery. Our Code of Integrity for Employees is available via our internal quality management system. Each of these policies sets out our expectations of our employees and supply chain and reinforces our zero-tolerance of modern slavery in our organisation and beyond.

We continue to encourage all concerns to be reported either in person or confidentially in line with the policies above. In the reporting period, the business did not identify any instances of modern slavery, and no reported complaints or grievances were raised relating to this area.



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 where necessary across four key workstreams:

- **Governance Policy and Disclosure** (set out to the right)
- **Supply Chain** (pages 9 to 11)
- **Labour and Recruitment** (page 12)
- **Training and Communication** (page 13)

Risk Management

The Group operates a Risk Management Framework across the business to provide a structured approach to identifying, addressing and monitoring risks that could threaten achievement of the strategic objectives of the Group.

Risk registers are the key medium through which the Risk Management Framework is applied. They include an assessment of the potential impact and likelihood of identified risks and outline the controls in place to bring the risks to an acceptable level. Risks, including those relating to modern slavery are tracked and managed using risk registers, which are maintained at various levels:

- Board risk register
- Group Leadership Team (GLT) risk register
- Divisional and functional risk registers

As a business operating within the built environment sector, we recognise the significant risks of modern slavery and exploitation inherent in our industry. These risks are driven by several factors, including skills shortages, multi-tiered supply chains, and the prevalence of indirect and self-employed labour. While we are confident in our ability to manage these risks effectively and maintain robust controls, we understand the challenging context in which we conduct our operations. Our commitment is to continually enhance our practices to uphold the highest standards of ethical conduct and to ensure the protection of human rights throughout our operations and supply chain.

To support a coordinated industry response to modern slavery, we continue to actively participate in the Supply Chain Sustainability School's Built Environment Against Modern Slavery working group. This multi-stakeholder forum enables collaboration across the construction sector to identify and address modern slavery risks, share best practices, and strengthen collective action. Our engagement reflects our commitment to transparency and continuous improvement, in line with the expectations set out in the UK Government's updated guidance on modern slavery reporting.

Risk Management and Due Diligence Processes Continued

Due Diligence Governance

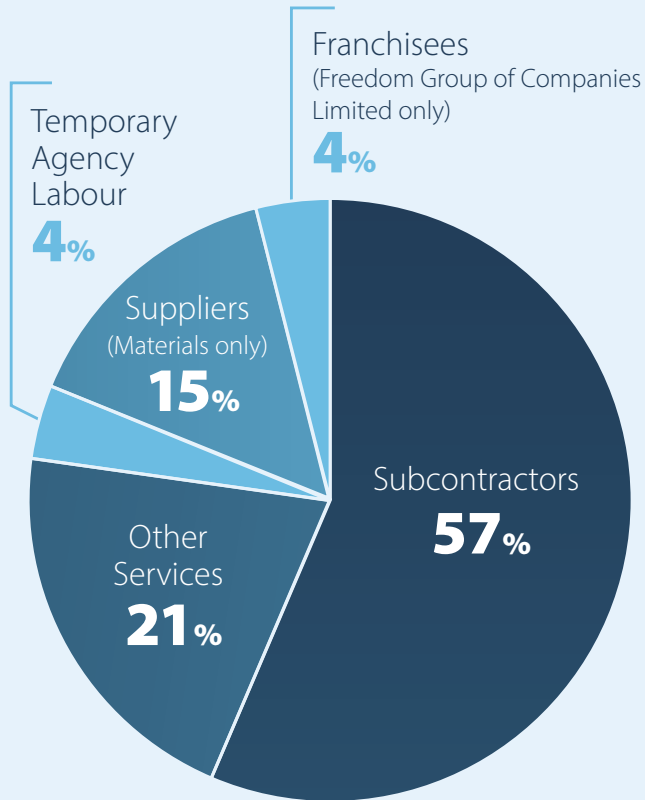
Our due diligence processes enable us to monitor compliance with our policy commitments and assess their effectiveness. Since the last report:

- Within the reporting year our Modern Slavery Working Group continued to meet on a regular basis. Progress was reported to our Journey to Net Zero steering committee and a further update was provided to our Audit and Risk Committee at the mid point of the year. This statement was reviewed and approved by the Audit and Risk Committee prior to being review and approval by our Board of Directors in August 2025
- Throughout 2024/25, progress on our modern slavery KPIs was regularly reported to our Audit and Risk Committee. Further detail of our performance against these KPIs can be found on page 14.
- We undertook a detailed desktop review of modern slavery risks for our most material suppliers. Using information sourced from the Global Slavery Index supported by sourcing information from our suppliers and procurement teams, the review considered the prevalence of modern slavery per 1,000 head of population, a country's vulnerability to modern slavery, the potential risk of the use of migrant workforce and known sourcing routes.
- Our Anti-Slavery and Human Trafficking Policy has been updated in accordance with best practice, with revisions made to clearly define our expectations
- An independent third-party review of our approach to modern slavery risks identified good practice along with opportunities to further strengthen our practices and enhance disclosures, in line with leading guidance. We have implemented several of their recommendations in our 2024/25 reporting to reinforce our ongoing commitment to transparency and continuous improvement.
- We audited 75% of our resourcing suppliers within the year. These audits were conducted in person by members of our HR team, utilising a set of questions and checks developed by Internal Audit. We met with suppliers in person to understand what steps they take to prevent modern slavery in their temporary labour supply.



Our Supply Chain

The Group's Supply Chain



Representation of our supply chain expenditure, based on full financial year spend for the 2024/25 reporting period

Our Group works with approximately 3,200 suppliers, supporting our operational businesses and Group functions. 15% of these suppliers account for 80% of our spending.

The majority of our Tier 1 (direct) supply chain are based in the UK, though we also procure goods and services from the EU on an ad-hoc basis to meet specific contracts and client needs. In some instances, clients provide goods to us on a free issue basis. However we understand that our broader supply chain extends globally. Our supply chain consists of large multi-national organisations (c30% of spend) and small and medium enterprises (SMEs) (c70% of spend) that deliver a range of goods and services.

We are committed to identifying and addressing potential risks throughout all levels of our supply chain (as outlined on page 7). Our contracted suppliers of goods and services are required, through our pre-qualification process, to align to the principles of our Code of Integrity for Business Partners, to combat slavery and human trafficking. The pre-qualification process requires new suppliers to provide information and evidence of their approach to tackling slavery and human trafficking.

In addition, for new suppliers who are legally required to publish a Modern Slavery Statement under the Modern Slavery Act 2015, we also request that they share a copy with us. For existing suppliers, the disclosure process is ongoing through our continuous refresh of supplier information with respondents required to agree to operate in line with our Code of Integrity for Business Partners. This document explicitly outlines our requirements around modern slavery. Where suppliers do not agree to the Code, we seek to engage with them to understand their policies and procedures prior to commencing work.


We continue to engage with our supplier base at pre-construction stage to ensure alignment with opportunities and working practices and in the forthcoming year we are introducing a new supply chain management platform which will enable enhanced supplier risk management and streamline our processes.

We continue to work with the Built Environment Against Modern Slavery group who are encouraging collaboration across the industry.

We acknowledge the pressure that late payments can create with the supply chain and how this can contribute to the risk of modern slavery in our sector. Payment performance in our sector is inherently challenging due to complex supply chains, contractual terms, and the impact of disputes.

We continuously invest in our processes and procedures to pay our supply chain on time and have invested in our electronic procurement platforms, improving the speed, accuracy and supplier experience of invoicing. In 2024/25, we partnered with the Earlytrade platform to provide our Engineering subcontract trade partners with the choice to receive early payments. This increased optionality gives a route to improve their cash flows in return for a small discount to cover the cost of the platform. This system is not supplier financing (no bank involved) and existing payment terms remain unchanged. Subcontractors are not required to use Earlytrade and can continue to be paid as normal. Looking ahead, we plan to explore extending the use of this offering to our broader supplier base to increase their optionality around cash flow.

Our payment performance reporting remains consistently industry-leading with the percentage of invoices paid within 60 days in 2024/25 improving to 99% (2023/24: 98%), an improvement of approximately 40% since 2019. We closely monitor our payment performance and regularly report on it to the Board and Audit and Risk Committee, and it will continue to be an area of focus.



Our Supply Chain (continued)

In 2024/25 our Engineering business revised and re-issued the terms of our agreement for the supply of temporary workers. The updated agreement reinforces our commitment, and that of our suppliers, to the terms of the Modern Slavery Act.

Additionally, new Terms and Conditions were issued to the permanent recruitment agencies on the Group's preferred supplier list, reinforcing the requirement for compliance with the Modern Slavery Act.

Across the Group our standard trading terms, commercial agreements, subcontract conditions and our Code of Integrity for Business Partners, which is incorporated into our agreements, contain the relevant provisions that places an obligation upon our supply chain to mirror our slavery and human trafficking commitments and to ensure their compliance with the Act. Our standard working practices and procedures in making payments continue to ensure that we do not make cash payments to our supply chain.

To ensure compliance we plan to conduct regular audits of our suppliers and have included this activity as one of the key audit activities in the revised agreement.



Supply Chain Heat Map

Our Tier 1 supply chain consists of primarily UK domiciled companies (albeit some parent companies are registered overseas). The Tier 2 supply chain (those companies supplying our Tier 1 suppliers) is more extensive, with products originating from a range of UK, European and overseas (Asia-Pacific, Middle East and Indian sub-continent) markets.

We have conducted a review of modern slavery across our supply chain for our most material suppliers of products and subcontractors as set out on the map to the right.

- 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
- These reviews have allowed us to identify targeted actions, including supplier due-diligence auditing, planned for the 2025/26 year
- We have also undertaken a desktop assessment of modern slavery risks and controls for 25% (by spend) of our supply chain, of which 10% attended modern slavery training delivered by the Supply Chain Sustainability School, an organisation that provides training and resources to improve sustainability practices within supply chains



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 HR, payroll and learning management system, MyDayforce, is integrated throughout the business. It enables us to manage our recruitment, onboarding, people management, learning and development in a transparent, streamlined, and efficient manner. This system is supported by other processes and controls including:

- Our UK Recruitment and Selection Policy, offer of employment letter and contract of employment stipulate that all applicants must provide proof of their Right to Work in the UK. This requirement is in accordance with the amendment to the Immigration, Asylum, and Nationality Act 2006. The People Services team and recruiting managers throughout the Group are responsible for ensuring that each applicant can provide valid proof of their Right to Work in the UK, in line with the Home Office Guidance
- We utilise the services of TrustID, a certified digital identity services provider (IDSP), to conduct Right to Work checks. Additionally, recruiting managers conduct the required imposter checks with candidates. For candidates who do not have a passport and therefore cannot use the TrustID service, the recruiting manager conducts a manual verification. This involves reviewing the validity of their documents in the presence of the applicant and taking copies of these documents, which are then stored centrally. As part of the induction process in MyDayforce, recruiting managers are required to confirm that the imposter check has been completed
- As a Group we understand the requirements for employing individuals from outside of the UK. Our recruiting managers work closely with our People Services team throughout this process
- Although our Group has a sponsorship licence, only a limited number of roles within our business are eligible for sponsorship (on the list of skill shortages). We understand and comply with our reporting responsibilities and Home Office requirements
- For individuals joining the Group from outside of the UK, online checks via the Home Office are conducted in support of a candidate's proof of the Right to Work in the UK. This includes EU nationals and individuals with biometric residence permits. The Group keeps a record of all colleagues with time-limited Right to Work documentation and has a monthly follow-up check routine to ensure colleagues hold continued valid Right to Work documentation
- When new employees join the Group, other pre-employment checks are conducted by our People Services team, where appropriate. These include references and relevant qualification / training checks and a request for a National Insurance number which also forms part of an individual's evidence of the Right to Work in the UK. Where discrepancies arise, we will discuss with the employee and escalate further where necessary
- We do not make any cash or cheque payments to our employees. All payments are made via direct bank credit to an account authorised by each employee. Employees can access our MyDayforce system, which has a password protected self-service facility for them to manage their personal details, including bank account information
- Where we utilise the services of temporary labour resource within our business, we seek to comply with the Act through the imposition of several contractual obligations on our third-party agencies that requires compliance with the relevant laws pertinent to the provision of the resource, including compliance with modern slavery legislation. Where we are subject to a third-party contract arrangement, we work with the third-party to set our expectations with regards to the prevention of modern slavery. In 2024/25, temporary agency labour and resourcing suppliers working alongside our Engineering, Facilities Services and IT Services businesses were successfully audited. The focus for the forthcoming year will be to expand this scope to incorporate Freedom temporary labour resource



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, requirements for modern slavery disclosures and supply chain mapping
- We took steps to ensure that 100% of all new employees completed modern slavery e-learning. This will be monitored throughout the forthcoming year to ensure compliance is maintained
- All Employee Workforce Forum representatives in our Engineering business received information about modern slavery resources and training. The Group also took the opportunity to reinforce our messaging with a communication supporting Anti-Slavery Day. Using resources from the Gangmasters and Labour Abuse Authority and Stronger Together, an international cross-sector not-for-profit organisation that supports businesses in tackling modern slavery, we provided multi-language materials for use at our site locations and toolbox talk briefings
- We have incorporated a detailed case study scenario into our People Leader Programme, which is the core training programme for NG Bailey supervisors, team leaders and first level managers. This scenario forms part of the crucial conversations section, facilitating a conversation on potential warning signs and appropriate actions. 30 first-line managers have participated in the people leader programme since its implementation during the year
- We have also included modern slavery awareness into 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 will publish an early careers bulletin to raise awareness of modern slavery and distribute the pocket guide to new apprentices
- The working group also explored the need for training in other roles and recognised that further support and training will be helpful for our existing employees. As part of our FY25/26 KPIs we will focus on improving awareness with our frontline staff with a "Spot The Signs" campaign.



Continuing to Manage our Risk – Key Performance Indicators (KPIs)

Our modern slavery working group set key performance indicators (KPIs) for the 2024/25 year.

We are pleased to report that we met all of them.

We recognise the importance of continuing to build on this progress. As a result, we have set new KPIs for 2025/26 to replace the 2024/25 KPIs (set out over the page) to drive further progress and encourage continuous improvement.



Achieved



Underway and ongoing



Requires further development/consideration

| 2024/25 KPI | Status |
|--|--|
| 100% of suppliers where we spend more than £2m per annum to complete modern slavery online learning via the Supply Chain Sustainability School | |
| Identify high risk modern slavery regions for our industry and map against the existing supply chain | |
| In 2024/25 75% of resourcing suppliers to be audited annually as a minimum increasing to 100% in 2025/26 and thereafter | Phased target. 75% in 2024/25 100% per financial year thereafter – see 2025/26 KPIs |
| 100% of all new employees to complete modern slavery e-learning | |
| 100% of employees in a role that influences or controls an element of buying or spend to have completed enhanced modern slavery training | |
| 100% of the Resourcing Team to have completed Modern Slavery Training | |
| Identify other roles within our Group beyond our resourcing and procurement teams who would benefit from modern slavery training and rollout learning requirements | |
| Make on-site posters / key communications available in dual languages based on most common victim profiles | |
| Make available to all employees an interactive masterclass that shares best practice examples | |
| Integrate prevention of human rights abuse into People Leader Programme and Apprentice Programme | |
| Make enhanced training available to our Workforce Forum Representatives | |

2025/26

Key Performance Indicators

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
- 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
- Establish a plan and begin to review the material suppliers sourcing from Global Slavery Index (GSI) 'high risk' countries as identified in our heat mapping process
- Refresh the audit programme to conduct further due diligence for subcontractors identified as having a potentially higher probability of exposure to use of a migrant workforce

Labour and Recruitment

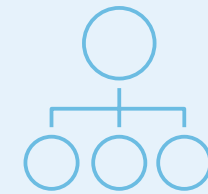
- 100% of temporary agency suppliers audited within the reporting year

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
- Increase participation in modern slavery training among site-based staff by providing line managers with the tools to deliver a 'Toolbox Talk'
- Monitor and maintain 100% completion of modern slavery e-learning for all new relevant starters

Governance and Policy

- Embed modern slavery questions into Senior Leadership site visits across the Group
- Enhance and update existing governance training to ensure continued and appropriate coverage of modern slavery and related ethical practices
- Appoint an independent remediation provider to support potential victims and communicate our remediation process to all stakeholders
- Enhance our approach to modern slavery risk assessments, building on the existing supply chain heat maps in place.
- Review the internal escalation procedure for the Group to address cases of suspected modern slavery



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 28 February 2025.

Further Steps

We remain committed to ensuring there is no modern slavery or 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. The roll out of a new supply chain system is underway across the Group to support the onboarding and on-going audit and performance management of our supply chain partners
- Engaging further with independent third parties to increase visibility of best practice and benchmarking in relation to our modern slavery approach





NG Bailey

NG Bailey Group Limited

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