

Algeco UK Limited

Modern Slavery & Human Trafficking Compliance Statement

June 2024

1. INTRODUCTION

At Algeco UK Limited (“**Algeco**”) we operate our business in a responsible manner and to the highest standards of business conduct in order to ensure compliance with all applicable laws and regulations. As such, we are committed to constantly improving our practices across our business and taking positive steps to combat modern slavery and human trafficking in our supply chains.

We acknowledge that slavery can occur in many forms, including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting. Whilst we have already taken steps to comply with the legal requirements to combat various forms of modern slavery, we continue to improve our governance framework and practices to prevent modern slavery.

During the financial year ending 31 December 2023, we launched our Responsible Sourcing Policy and Supplier Assessment process, strengthening our modern slavery risk management. This year, we intend to deliver training on modern slavery for our employees to improve people's awareness and actions regarding modern slavery. Therefore, this statement presents the actions already taken and our continuous plans to address modern slavery.

2. OUR STRUCTURE AND SUPPLY CHAINS

Structure:

Algeco provides relocatable accommodation in the UK, including portable cabins, modular buildings, permanent buildings, secure storage, portable toilets, temporary fencing, and related products and services. We provide modular buildings for sale and rent and off-site permanent buildings for sale throughout the UK for temporary, semi-permanent and permanent use across a wide range of sectors. With the head office at Ravenstock House, 28 Falcon Court, Preston Farm Business Park, Stockton-On-Tees, TS18 3TX, Algeco operates from a network of branches throughout England, Scotland and Wales. We are a subsidiary of the Modulaire Group, which has over 4,800 employees and operates in 23 countries in Europe and Asia-Pacific.

Further details about Algeco can be found at: <https://www.algeco.co.uk/> and our parent company, Modulaire, at <https://www.modulairegroup.com/>

Supply chains:

Depending on the products or services, we engage with our suppliers through different forms, such as one-off purchases or long-term supply contracts. In 2023, we partnered with 1,663 suppliers, of which 181 represented the top 80% of our spend (our “Key Tier 1 suppliers”). The majority of our suppliers are UK-based.

Most of our vendors and subcontractors broadly cover the following categories of goods and services:

- Materials for buildings, including steel components, walls and panels, insulation, electrical components, plumbing supplies and flooring; and
- Sub-contract services for construction, catering and housekeeping, specific delivery, installation, disassembly and repair/maintenance work.

Relationships with bodies representing workers:

At Algeco, all employees have a voice through the following forums, which enable collaboration, progress initiatives and resolve issues raised by colleagues:

- Colleague Information & Consultation Committee (CICC, up until late May 2024): elected colleague representatives from all business areas, met monthly with Company Representatives to receive information and discuss any matters raised by the colleagues they represent. The primary purpose of the CICC was to provide a collaborative forum for two-way communication on anything relating to the employment of colleagues across the Algeco business. Since late May 2024, this committee has disbanded and been replaced by a variety of means, including through newly appointed Engagement Champions
- Engagement Champions: this is a voluntary forum specifically focusing on active colleague involvement and engagement. It is an opportunity to share thinking, ideas, and opinions in a constructive environment to improve the colleague experience of working at Algeco.
- Monthly All Hands meeting: all colleagues can attend the meeting to stay updated on business performance and progress and ask questions directly to senior leadership on any matters in the business. The meeting is a regular platform for open and two-way conversations between the leadership and everyone.

3. POLICIES ON MODERN SLAVERY & HUMAN TRAFFICKING

Algeco has a governance framework, which we continue to review and improve to monitor and address modern slavery. Our governance underpins how we conduct our business and interact with suppliers:

- Our Quality Management System (ISO 9001 certified) consists of policies and procedures related to human resources, health and safety, supplier management, and the Supplier Code of Conduct.
- Our Supplier Code of Conduct, ESG & Sustainability Policy, Responsible Sourcing Policy, and Code of Ethics reflect our commitment to acting ethically and with integrity in all business relationships.
- To ensure that those in our supply chains and our contractors comply with our values, we require vendors to sign up to our Supplier Code of Conduct, including a commitment not to use slave labour or participate in human trafficking. We seek acknowledgement of signing up at the onboarding stage for our suppliers. In 2024, we have also been rolling out a mandatory Responsible Sourcing Assessment with vendors who are new to us and those account for 90% of our spend.
- We nurture a transparent culture where anyone can raise concerns about our business without fearing retaliation. Our Speak-Up policy outlines how reports can be made and whistle-blower protections.

- We recently launched our Responsible Sourcing Policy and Guidelines, which outline our requirements and procedure to collaborate with suppliers along the value chain, embed Environmental, Social, Governance and Sustainability (ESGS) at all stages, review ESGS performance as part of routine supplier relationships, improve our knowledge of the supply chains upon which we depend and drive continuous ESGS improvements.

All of our policies are developed by respective business functions in collaboration and consultation with relevant teams across the business, including but not limited to Legal, HR, Procurement, ESG & Sustainability, and Operations. The UK Managing Director is responsible for ensuring compliance with anti-modern slavery and human trafficking policies within the UK operations.

4. DUE DILIGENCE PROCESSES FOR SLAVERY & HUMAN TRAFFICKING

Our governance framework enables us to review our suppliers' performance in ESGS continuously:

- Following our Responsible Sourcing Policy, we have rolled out a Responsible Sourcing Assessment on suppliers, who account for 90% of our spend. This helps us identify, assess, and mitigate potential ESGS-risk areas in our supply chains.
- Our Responsible Sourcing Assessment has three questionnaire options, of which option three is an in-depth due diligence on an individual supplier. If we identify a supplier or single product from a high-risk sector or geography, we will use the in-depth due diligence questionnaire to assess their ESGS performance (which covers modern slavery & human trafficking).
- We require our suppliers to sign up to our Supplier Code of Conduct and Responsible Sourcing Policy, which include the prevention of modern slavery;
- We protect whistleblowers through our Speak-Up policy.

5. RISK ASSESSMENT & MANAGEMENT

Direct business operation:

Within our internal business operations, we consider the risk of modern slavery to be low. We monitor and mitigate this risk through our existing governance framework, and we comply with the relevant national labour legislation. We have policies and procedures relating to staff employment and their onboarding, including our approach to modern slavery and intolerance of any form of bullying or discrimination.

Supply chain:

Using available data from various sources from international organisations and NGOs concerning geographic locations for modern slavery risks, our supply chain data demonstrates that the majority of our Key Tier 1 Suppliers are based in low risk countries.

Actions taken to address and assess modern slavery risks:

To address and assess the risks of modern slavery in our business, Algeco has undertaken the following actions:

- Conducted an assessment of our Key Tier 1 Suppliers, which covers modern slavery issues;
- Assessed modern slavery risks and kept our Board informed on the progress;

- Set up a mechanism to allow people to safely report modern slavery risks in our business operations and supply chains through our whistleblower policy;
- We provided access to a training video (provided by Supply Chain Sustainability School) to all employees to improve their understanding of the impacts and risks of modern slavery in operations and supply chains;
- Ensured appropriate recruitment processes and procedures were in place, including conducting eligibility to work checks for all employees to mitigate against human trafficking or forced labour. The majority of our colleagues are employed on permanent or fixed-term contracts; however, when temporary staff are needed, Algeco only uses reputable employment agencies.
- Launched a Responsible Sourcing Policy and Supplier Assessment process to ensure ESGs is embedded at all stages of our supply chain.

6. PERFORMANCE INDICATORS

We have KPIs for our actions to address modern slavery within our business operations and across our supply chains. Aligning with our global activities, our actions and KPIs related to combatting modern slavery are regularly reviewed at our parent company's Executive Committee, our UK ESG Steering Committee, and Modulaire Group's ESGs Committee to ensure we are on track.

In addition, our parent company is a signatory to the United National Global Compact ("UNGC") (<https://www.unglobalcompact.org/what-is-gc/participants/144802-Modulaire-Group>). The assessment framework and reporting/communications mechanism of UNGC also help us assess the effectiveness of our measures in addressing modern slavery. We report annually for UNGC's Communication on Progress.

We evaluated our actions in the following three areas:

Governance & Due Diligence: as described above in sections 3 and 4.

Training: as described below in section 7

Continuous improvement of supply chain processes: Our Responsible Sourcing Policy and Supplier Assessment are part of our continuous improvement action plan to address modern slavery in our supply chains.

7. TRAINING:

In 2024, we intend to deliver an e-learning module on modern slavery as mandatory training for our people.

8. PROCESS OF CONSULTATION

We have brought this statement to the attention of those in our Procurement team, ESG & Sustainability team and HR team. We discussed details of the Modern Slavery Act 2015's reporting requirements and our strategies to address these requirements; we also allowed them to provide

feedback, raise queries, and have such queries answered. We have also involved our Legal and Procurement team in further assessing the risk of non-compliance in our supply chains.

9. OTHERS

Fully aware of the importance of businesses in combating modern slavery, Algeco UK actively presents our work at international and local forums to raise awareness of the issue. We also constantly learn from other organisations and quickly employ best practices to improve our actions on the topic.

10. ENDORSEMENT OF THIS STATEMENT

This statement was approved by the Board of Algeco UK.

James Odom
Group General Counsel
Algeco UK Limited