

# Modern Slavery Statement

## Introduction

H W Martin (Traffic Management) Ltd is committed to preventing modern slavery and human trafficking within our operations and supply chains. We recognize our responsibility under the Modern Slavery Act 2015 to take steps to ensure that modern slavery and human trafficking are not taking place within our organization or in any part of our business activities. This statement outlines our commitment to eradicating modern slavery and the actions we will take to achieve this goal.

## Policy Statement

H W Martin (Traffic Management) Ltd condemns all forms of modern slavery, including forced labour, child labour, and human trafficking. We are committed to:

- ▶ Ensuring that our business and supply chains are free from slavery and human trafficking.
- ▶ Complying with all relevant laws and regulations, including the Modern Slavery Act 2015.
- ▶ Implementing and maintaining effective systems and controls to prevent modern slavery.
- ▶ Providing training and awareness programs to our employees and suppliers to help them identify and combat modern slavery.
- ▶ Encouraging the reporting of any suspicions or concerns related to modern slavery without fear of retaliation.
- ▶ Investigating any reported cases of modern slavery thoroughly and taking appropriate action.
- ▶ All employees must have a written contract of employment setting out their terms and conditions in line with government requirements.
- ▶ To ensure that any issues or concerns about slavery or human trafficking can be raised, the Whistle Blowing procedure will be made available to our employees who are encouraged and supported to report any concerns in confidence.
- ▶ The Martin Group of Companies is a signatory to the Gangmasters and Labour Abuse Authority Construction Protocol.
- ▶ Collaborating with suppliers, contractors, and other business partners to promote ethical and responsible practices throughout our supply chain.

## Due Diligence and Supply Chain Management

The risk of modern slavery within our business is very low due to the established pre-employment and right to work checks we undertake. We therefore consider that modern slavery risks are most likely to be found in our supply chain and have adopted a proactive, risk-based approach to managing these. We work collaboratively with our supply chain partners informing them of our expectations and standards. We want to ensure that our delivery partners are acting as we expect.

We will carry out due diligence on our suppliers, contractors, and business partners to ensure they share our commitment to preventing modern slavery. Our due diligence process will include:

- ▶ Assessing their policies and practices related to modern slavery.
- ▶ Evaluating their risk of exposure to modern slavery.
- ▶ Collaborating with suppliers to address and rectify any identified issues.
- ▶ Ensuring that our contracts with suppliers and contractors include appropriate clauses addressing modern slavery.

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### Training and Awareness

We will provide training and awareness programs for our employees and key suppliers to ensure they understand the signs of modern slavery and the actions they should take to prevent it.

### Reporting and Whistleblowing

We encourage all employees and suppliers to report any suspicions or concerns related to modern slavery. We have established clear reporting procedures, and we will protect whistleblowers from any retaliation.

### Investigation and Action

Modern slavery is a crime and a violation of fundamental human rights, which will not be tolerated at The Martin Group of Companies. We are committed to doing business in a responsible way, which includes a promise to do all that we reasonably can to prevent all forms of modern slavery in any part of our business and our supply chain. We expect our customers and suppliers to share and uphold these same strong ethical values and principles. If a case of modern slavery is reported, we will conduct a thorough investigation. If the allegation is substantiated, we will take appropriate action, including notifying law enforcement authorities.

### Review and Continuous Improvement

We will regularly review and update this policy to ensure its effectiveness and relevance. We will continue to improve our practices to eradicate modern slavery from our operations and supply chains.

### Compliance and Accountability

All employees are responsible for complying with this policy. Senior management will provide the necessary leadership and resources to ensure its implementation. The position with overall responsibility for preventing Modern Slavery is the Director of Human Resources. The HSEQ Team are responsible for overseeing compliance with this policy.

Suppliers are expected to cooperate fully and to communicate their compliance with our standards across all workers, suppliers and sub-contractors engaged in their supply chain. Suppliers must also provide a mechanism for workers to report or discuss non-compliance confidentially.

### Assessing and Managing the Risk of Modern Slavery and Human Trafficking

In our Financial Year 2024/25, we set targets to monitor the effectiveness of our actions against modern slavery and human trafficking.

Target set for 2024/25	Progress made in 2024/25
Keeping under review our Modern Slavery Statement	All of these actions were completed and are under regular review in line with the requirements of our integrated management system
Continuing to assess the risks of modern slavery and human trafficking in our business and our supply chain	
Keeping under review our pre-qualification standards for the appointment of new suppliers and sub-contractors	
Implement a comprehensive risk assessment protocol to identify potential modern slavery risks within our	This has been started and the mechanism is being developed for the Group of Companies in

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operations and supply chains, followed by the development of targeted mitigation strategies.	collaboration with the Group Director of Human Resources.
Establish a confidential and accessible whistleblowing mechanism for reporting modern slavery concerns.	The whistleblowing policy was updated, and the company induction has been updated with the relevant independent reporting line.
Collaborate closely with our value chain to ensure adherence to ethical labour practices	Regular meetings to share lessons learned and the value chain have been invited to conduct e-Learning on the Supply Chain Sustainability School.

**Next steps for 2025/26**

We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking. Next steps will include:

- ▶ Continue to review and update pre-qualification standards for new suppliers and subcontractors, focusing on modern slavery risks.
- ▶ Send annual self-assessment questionnaires to suppliers, asking about their own anti-modern slavery measures, training, and reporting mechanisms.
- ▶ Conduct on-site audits of suppliers and subcontractors, focusing on high-risk areas or new partners.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes H W Martin (Traffic Management) Limited’s modern slavery and human trafficking statement for the financial year ended 31<sup>st</sup> July 2025.



Director

5<sup>th</sup> September 2025

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