

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

This statement is made on behalf of Compass Newco pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act') and constitutes our anti-slavery and human trafficking statement for the financial year ending 30th September 2022.

Our Business and Structure

Compass Newco was formed on 6th May 2016 and is the parent company of Compass Building and Construction Services Ltd and Orbis Services Ltd.

Policies on Anti-slavery and Human Trafficking

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. We build strong and effective relationships with local customers and suppliers, which helps mitigate the risk of slavery and human trafficking occurring in our supply chains. We expect our national supply chain to be based in the UK and have suitable anti-slavery and human trafficking policies and processes. We expect them to carry out due diligence in their supply chain. We conduct business in an open, honest, and transparent manner.

We employ skilled managers to optimise control of the work environment. We expect our management, employees, and supply chain to comply with all applicable local laws and regulations to ensure safe working conditions, treating workers with respect and dignity, acting fairly and ethically, and using environmentally responsible practices.

Positive steps to enhance our local communities were taken in early 2020, when we became real Living Wage Employers. We actively encourage our supply chain to adopt this also.

Due Diligence and Relevant Policies

The Finance Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it. We have internal auditing and compliance procedures to ensure we are conducting our business in an ethical and transparent manner. The SHEQ Manager is responsible for auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Procedures are in place to help ensure that we are operating in an ethical manner which are detailed in our Employee Handbook:

Anit-Harassment & Bullying

Anti-Bribery & Corruption

Equality in the workplace

Whistleblowing

Training

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

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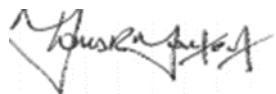
Communication and Awareness of this Policy

All relevant staff members are made aware of the Modern Slavery Act, and they have been informed of the risks of modern slavery and human trafficking in our supply chain and what to do if they suspect slavery and human trafficking.

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

The Directors are committed to review the policy annually.



Thom Macleod
Managing Director

Date: 26.04.25