

Slavery and Human Trafficking Policy

IDOM and its subsidiaries acknowledge that slavery and human trafficking represent gross violations of fundamental human rights. We fully support the implementation of the Modern Slavery Act 2015 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. Our commitment to fair employment practices is set out in within our Compliance System and Code of Conduct including our Corporate and Social Responsibility Policy (I-25). We recognise the importance of transparency in our approach to tackling these issues and expect the same high standards to be held by our contractors, suppliers and business partners. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, sub-contractors, external consultants, third-party representatives and business partners.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control and are required to avoid any activity that might lead to, or suggest, a breach of this policy. Directors/Managers must be informed if there is any suspicion of conflict with this policy at the earliest possible stage. If unsure about a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, a Director/Manager must be informed.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Before they can start any work for IDOM or on our behalf, our national and international suppliers are subject to checks to assess their compliance and suitability. Our Supplier Information Form now directly enquires as to what policies or procedures the organisation has to comply with the Modern Slavery Act 2015. The information received is scrutinised and further investigation taken where necessary.

Our risk management processes seek to ensure that particular areas of risk in our business and supply chains are identified and impact assessments undertaken prior to the commencement of projects. In cases where a specific ethical concern has been raised, the ethical issues, including any related to slavery and human trafficking, will be referred to and considered by our Ethics Committee prior to the approval of project work.

Because of our enhanced due diligence and other processes in place, we have decided not to implement specific training in modern slavery and human trafficking at this stage. However, in circumstances where we consider there may be particularly high risks, appropriate training will be developed and targeted at those personnel who may have direct exposure. This will be reviewed periodically.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes IDOM's slavery and human trafficking statement for the financial year ending 31 December 2023.

Nigel Huish

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Managing Director (IDOM Merebrook Ltd)

Viral Bhavsar

Managing Director (IDOM UK Ltd)

Expiry date 31st May 2024