

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the **Act**) and is published on behalf of Renew Holdings plc (**Renew Holdings**) and its subsidiary businesses (together, **Renew**).

Renew is fully committed to the identification and prevention of modern slavery and human trafficking and will not tolerate or condone any such identified act within any aspect of its business activities.

This statement sets out the activities undertaken by Renew to prevent modern slavery and human trafficking and constitutes its annual Modern Slavery Statement for the financial year ending **30 September 2025**. References in this statement to “we”, “us” or “our” are to Renew.

Organisational Structure

Renew Holdings, through its wholly owned subsidiary businesses, provides a diverse range of engineering services supporting the maintenance and renewal of infrastructure assets for both public and private sector customers in the infrastructure sector. Principal subsidiaries of Renew Holdings, which collectively form Renew, are:

- Shepley Engineers
- AmcoGiffen
- Carnell
- Seymour Civil Engineering
- Envolve Infrastructure
- Clarke Telecom
- QTS
- Browne
- Excalon
- Full Circle Wind Services

Renew operates predominantly in the United Kingdom (**UK**) and the majority of work is delivered by a directly employed workforce, supplemented where necessary by temporary workers supplied by reputable recruitment partners. All employees and temporary workers are eligible to work within the UK.

Renew recruits either directly or via its recruitment partners, which are required to successfully complete supply chain due diligence processes prior to being accepted as a recruitment partner. The cost of the recruitment of any worker engaged by Renew is borne by the relevant Renew company and, as part of due diligence and risk identification processes, we ensure that our supply chain and recruitment partners also adhere to this principle.

Renew also complies with applicable law relating to employment terms and health and safety. No worker engaged by Renew earns less than the living wage and we are not aware of any incidents of modern slavery in our business to date.

Supply Chain

Given the nature of our organisational structure, where subsidiaries of Renew Holdings directly employ work delivery using a mainly UK based supply chain, we consider that our exposure to risks of modern slavery or human trafficking is very low.

Should any such risk exist, it is most likely to be within Renew's extended supply chain. Renew companies work closely with their tier 1 supply chain members to identify risks and ensure they are addressed in an appropriate manner.

Modern Slavery Policy

Each Renew company adheres to comprehensive policies in respect of modern slavery and human trafficking, and a modern slavery statement is accessible from each company website. These policies and statements detail the individual Renew company's procedures and approach to the prevention of modern slavery and human trafficking, setting out the processes used to support and deliver on their commitment. Policies are communicated to the wider workforce and tier 1 supply chain partners for their awareness and action.

Renew operates a risk based approach to the identification of modern slavery and human trafficking, which is based on the location of the product or service, industry sector, supplier relationships and existing data held.

Renew Holdings plc
ANNUAL MODERN SLAVERY STATEMENT
2024-2025

This analysis is supported by additional information and guidance obtained from publicly available sources, such as the Global Slavery Index, Corruption Perceptions Index and US Department of Labor Lists of Goods Produced by Child Labor and Forced Labor.

Due Diligence and Identification of Risk

Renew continually reviews modern slavery risks in its business and supply chains through structured due diligence processes. Our policy of direct employment is supported by robust processes which ensure that an individual's identity is confirmed and they have a legitimate right to work in the UK. This policy and the right to work checks undertaken by each Renew company significantly reduce the risk that we employ individuals who may be subject to human trafficking or forced labour.

Where Renew use labour-only subcontractors, reliance on due diligence checks ensures that labour providers comply with our commitment to the prevention of modern slavery and that the processes of those providers contain no illegal labour practices.

Renew companies also maintain robust grievance mechanisms which are accessible to all workers, to promote transparency and safe reporting. To date, we have not received any reports relating to modern slavery or human trafficking in our operations or supply chain.

Performance Indicators and Future Commitments

We have made progress in ensuring the effectiveness of our slavery prevention procedures. Renew activities over 2023 to 2025 have included:

- Conducting risk assessments and completing a data analysis on supply chain activities to identify and prioritise any areas that may pose a risk of modern slavery.
- Reviewing processes and procedures to ensure that modern slavery and human trafficking is not taking place in our business.
- Introducing anti-slavery and ethical procurement policies.
- Organising staff initiatives including employee modern slavery awareness training.
- Improving supplier reviews, vendor assessments and audit processes for new and existing suppliers and vendors.
- Undertaking the CIPS Ethics Course which provides vital up to date information on modern slavery and areas of concern and risk.

Renew objectives for the year ahead are to:

- Continue monitoring both high and medium risk suppliers using a range of initiatives across individual Renew companies.
- Periodically review our supply chains and those of our suppliers to ensure an evidenced ongoing commitment to the prevention of modern slavery and that suppliers' risk statuses have not changed.
- Continue engaging with key strategic suppliers and industry bodies across the markets in which they operate to understand capability, best practice and ensure our knowledge on modern slavery prevention remains up to date.
- Participate in collaborative initiatives focused on promoting human rights and preventing slavery and human trafficking.

Communication, Training and Review

Our commitment to the prevention of modern slavery and human trafficking emanates directly from our Board of Directors. Their leadership on and commitment to this important social issue has been clearly communicated to Renew Holdings and each of its subsidiaries. This statement is reviewed annually by our Board of Directors and updated to reflect evolving best practices and legal requirements.

Colleagues across Renew receive training in relation to modern slavery appropriate to their position and involvement or responsibility in the engagement of workers or management of supply chain matters. This statement is available to all who work for or on behalf of Renew and is published on our website.

Renew Holdings plc
ANNUAL MODERN SLAVERY STATEMENT
2024-2025

Commitment

We acknowledge that we are committing to a long-term strategy and will continue to review and evolve our approach to the prevention of modern slavery and human trafficking year on year.

We will use our annual statements to publicly reaffirm our continued commitment and to communicate this evolution, including the steps we have taken and will continue to take, to address this morally and socially important issue.

The Board of Directors have reviewed, accept and fully support this statement and formally approved it on 6 May 2026.



Paul Scott
Chief Executive Officer
Renew Holdings plc
6 May 2026