

### **Introduction**

Renew Holdings plc (Renew) and its subsidiary businesses are fully committed to the 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 is made pursuant to Section 54 of the Modern Slavery Act 2015, it sets out the activities undertaken by Renew Holdings plc and its subsidiary businesses in respect of the prevention of Modern Slavery and Human Trafficking and constitutes the Company's annual Modern Slavery Statement for the financial period **1 October 2023 to 30 September 2024**.

### **Organisational Structure**

Renew Holdings plc, through its wholly owned subsidiary businesses, provide 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. Renew Holdings plc principal subsidiary businesses are:

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

Renew Holdings plc and its subsidiary businesses operate mainly in the United Kingdom where the majority of work is delivered by a directly employed workforce, supplemented where necessary by temporary workers supplied by reputable recruitment partners, all of whom are fully eligible to work within the United Kingdom.

Renew Holdings subsidiary businesses recruit either directly or via a limited number of reputable recruitment partners, who 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 or its subsidiary businesses will be borne by Renew or its subsidiary businesses not the worker and, as part of due diligence and risk identification processes, our businesses ensure that our supply chain and recruitment partners also adhere to this principle.

### **Supply Chain**

Given the nature of Renew Holdings plc organisational structure and our subsidiary businesses model of directly employed work delivery utilising a mainly UK based supply chain, we consider that any exposure to risk of Modern Slavery or Human Trafficking is extremely low and that should any risk exist it is most likely to be within the extended Supply Chain. Our subsidiaries work closely with their Tier 1 Supply Chain members in the identification of such risk to ensure it is addressed in an appropriate manner.

### **Modern Slavery Policy**

Our subsidiary businesses produce comprehensive policies in respect of Modern Slavery and Human Trafficking which are available to view on their company websites. Links to our subsidiary's websites can be found at <http://www.renewholdings.com/contact>. These policies and supporting procedures detail the subsidiary businesses approach to the prevention of Modern Slavery and Human Trafficking, along with the processes used to support and deliver their commitment. These policies and commitments are communicated to the wider workforce and Tier 1 supply chain partners for their information and action.

Renew Holdings plc and its subsidiary businesses operate a risk based approach to the identification of Modern Slavery and Human Trafficking, the principle of which is based on the location of the product or service, industry sector, supplier relationships and existing data held, supported by additional information and guidance obtained from, but not limited to, sources such as the Global Slavery Index, Corruption Perceptions Index and US Department of Labour Lists of Goods and Suppliers.

### **Due Diligence and Identification of Risk**

Renew Holdings plc and its subsidiary businesses policy of direct employment is supported by robust processes

**Renew Holdings plc**  
**ANNUAL MODERN SLAVERY STATEMENT**  
**2023-2024**

---

which ensure that an individual's identity is confirmed and they have a legitimate right to work in the United Kingdom. This policy and the right to work checks undertaken by our subsidiaries significantly reduce the risk of directly employing forced labour or those who may be subject to human trafficking. Where subsidiary businesses of Renew Holdings plc utilise labour only sub-contractors the introduction of due diligence checks ensure that, as a minimum, labour providers comply with our commitment to the Prevention of Modern Slavery and their processes for recruitment contain no illegal labour practices.

**Renew subsidiary businesses activities during 2023/24 included:**

- Continued risk assessment and the completion of a data analysis of supply chain activities to identify and prioritise any areas which may pose a risk of Modern Slavery.
- Continued review of processes and procedures to ensure that modern slavery and human trafficking is not taking place.
- Introduction of Anti-Slavery and Ethical Procurement Policies
- Initiatives including employee Modern Slavery awareness training, improved supplier reviews and vendor assessment and improved audit processes.
- Incorporation of Modern slavery requirements into new and existing supplier review processes.
- Undertaking the CIPS Ethics Course which provides vital up to date information on modern slavery and areas of concern and risk.

**Renew subsidiary businesses objectives for the financial year 2024/25 include:**

- Continuing to monitor suppliers using a range of initiatives across our subsidiary businesses including the monitoring of suppliers to cover both high and medium risk suppliers and looking at the supply chain to evidence their commitment to the prevention of Modern Slavery.
- Undertaking further supply chain reviews to ensure that any potential new or existing suppliers have not changed their status in terms of "risk".
- Continuing to engage with key strategic suppliers and industry bodies across the markets in which they operate to better understand capability, best practice and learning on Modern Slavery to continuously improve our approach to Modern Slavery.
- Participation in collaborative initiatives focused on human rights in general, slavery and human trafficking.

**Communication and Training**

Our commitment to the prevention of Modern Slavery and Human Trafficking emanates directly from our Board of Directors. Their leadership and commitment to this important social issue has been clearly communicated across our subsidiary businesses. Colleagues across our subsidiary businesses receive training in relation to Modern Slavery appropriate to their position and their involvement/responsibility in the engagement of workers and/or for dealing with supply chain matters.

**Commitment**

We acknowledge that we are still in the early stages of a long-term strategy and our approach to the Prevention of Modern Slavery and Human Trafficking will undoubtedly evolve year on year.

We will utilise 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 deal with this morally and socially important issue. The Board of Directors have reviewed, accept and fully support this statement and formally approved it on 7 May 2025.



Paul Scott  
**Chief Executive Officer**  
**Renew Holdings plc**  
7 May 2025