

# Slavery and Human Trafficking Statement

## Introduction

Colas Rail publishes this statement in accordance with the Modern Slavery Act 2015. This statement sets out the steps taken during the year ending 31 December 2025 to prevent slavery and human trafficking at Colas Rail and within its supply chain.

Colas Rail is dedicated to operating a business free from slavery and human trafficking. However, Colas Rail recognises that the construction industry is considered a high-risk sector due to its reliance on manual and wage-based labour. Additionally, Colas Rail's diverse operations and international supply chain present inherent risks of non-compliance that must be actively managed and routinely investigated.

## Policies & Due Diligence on Slavery and Human Trafficking

Colas Rail maintains a strong ethical framework underpinned by the following policies:

- The Group Code of Ethics,
- The Whistleblowing Procedure,
- The Equality, Diversity and Inclusion Policy,
- The Anti-Slavery and Human Trafficking Policy,
- The Modern Slavery Emergency Response Plan ("Response Plan"), and
- The Sustainable Procurement Policy.

These policies are accessible to all employees and/or workers via the Colas Rail intranet page and are displayed in our offices and relevant site facilities.

In 2025, Colas Rail began working on finalising the Modern Slavery procedure, which sets out Colas Rail's zero-tolerance stance on the issue. In 2026, Colas Rail aims to finalise this procedure.

The "Unseen" application, which educates staff and allows them the opportunity to raise slavery and trafficking concerns both during and outside of work hours via the modern slavery helpline, continues to be available on Colas Rail smartphones. Slavery and trafficking concerns can also be reported internally via the Whistleblowing Procedure.

In June 2025, Colas Rail finalised and issued its Response Plan, marking the first formal publication of this procedure across the business. The Response Plan provide clear, practical guidance to employees and contractors on how to identify, report and ultimately respond to suspected cases of modern slavery across both on-site operations and within the wider supply chain. It recognises that modern slavery can take many forms, including human trafficking, forced labour and exploitation, and that victims may not always be immediately identifiable or aware of their situation.

The Response Plan is structured around three key objectives:

### a. Early identification of risk

Employees are supported in recognising potential warning signs of exploitation and are instructed on how to respond safely and appropriately without placing individuals at further risk.

### b. Clear and accessible reporting pathways

The Plan reinforces the use of established reporting mechanisms, including the Modern Slavery Helpline, the Unseen App and internal whistleblowing channels, ensuring concerns can be raised confidentially at any time.

### **c. Effective escalation and safeguarding**

It sets out a clear escalation process, including guidance for situations of immediate danger and coordination with relevant authorities. The Response Plan emphasises that the safety of both the individual and the reporter is the primary priority, and that incidents must be handled through appropriate governance channels.

In addition, the Response Plan establishes requirements for record-keeping and internal accountability, ensuring that any reported concerns are documented appropriately and can support potential investigations by authorities.

Colas Rail also maintains a robust approach to whistleblowing as a key mechanism for identifying and addressing potential modern slavery risks by operating a confidential, independently accessible whistleblowing platform, which is available to employees, workers and members of our supply chain. Concerns can be raised via online submission, email or telephone, allowing individuals to report suspected cases of modern slavery securely and, where preferred, anonymously, where they have witnessed or have first-hand knowledge of such issues. Details of how to access the whistleblowing platform are communicated regularly to employees through mandatory ethics training sessions, ensuring awareness and understanding of reporting routes. In 2025, Colas Rail undertook a targeted campaign to further increase awareness of the platform, including the distribution of company-wide dedicated communications and the display of whistleblowing posters across offices and depots. In addition, Colas Rail's external website continues to provide clear information on how to access the platform, ensuring that third parties (including suppliers) can easily raise legitimate concerns.

Colas Rail continues to provide new suppliers with the latest CSR Charter for Supplier and Sub-Contractors and the Colas Rail Health, Safety and Sustainability Statement of Expectations as part of the Colas Rail Supplier and Sub-Contractor on-boarding process. This statement contains an undertaking to ensure that no modern slavery is present in the business or supply chain, as well as our other sustainability initiatives.

In addition to this, in 2025 Colas Rail collected the latest Slavery and Human Trafficking Statements from our active suppliers who are not exempt from producing one. Colas Rail will continue to do this in 2026.

### **Supply Chain**

Colas Rail procures a variety of goods and services and manages a complex supply chain. Colas Rail continually monitors and manages its supply chain to meet its due diligence obligations and mitigate modern slavery risks. As a minimum, compliance checks are conducted on the top 75 suppliers (by spend and per division) and suppliers considered to be high-risk (or potentially high risk) for ethical non-compliance for all divisions of Colas Rail, and Colas Rail continuously strives to try to check as many suppliers as possible.

Colas Rail is committed to only doing business with those companies who have taken active steps to mitigate the risk of slavery and human trafficking in their business. To ensure that Colas Rail's supply chain is free from modern-slavery, in 2023 Colas Rail introduced the Modern Slavery and Human Trafficking Questionnaire ("Modern Slavery Assessment"), which allows us to audit our supply chain. The questionnaire is completed by high-spend and/or high-risk suppliers, to identify areas of risk. It also enables Colas Rail to produce actions plans for these suppliers, which will help our supply chain to minimise risks of modern slavery and human trafficking.

**In 2025:**

- A total of 101 suppliers across all divisions within Colas Rail completed a Modern Slavery Assessment, which exceeded minimum internal targets of at least 60 assessments
- Where applicable, minor improvements were identified and communicated through action plans, with Colas Rail supporting suppliers in strengthening their reporting and practices
- Colas Rail undertook a comprehensive labour audit exercise which included:
  - Supplier performance and compliance reviews
  - Monitoring of supplier action plans
  - Evaluation of risks using internal assessment tool
  - Verification that suppliers are paying staff appropriate rates
- Increased engagement with high-risk suppliers including labour providers
- Active supply chain management through structured review meetings to challenge supply chain to maintain high ethical standards.

**2026 Commitments:**

- Colas Rail commits to auditing at least 80 suppliers for modern slavery, including comparisons against previous submissions to track progress and improvement
- Continue to embed the Modern Slavery Assessment into procurement and tender processes to increase supplier coverage.
- Develop and implement an Environmental, Social and Governance (ESG) Charter to strengthen expectations and support provided across our supply chain.
- Colas Rail will continue to review contractual provisions to ensure that they are effective in preventing slavery and human trafficking by improving audit rights and visibility. We also continue to review the terms on which we engage with our supply chain to ensure that they are as effective as possible.
- Colas Rail will continue to challenge our supply chain through supply chain management review meetings to ensure the highest standards are being maintained.

This statement has been approved by the Executive Committee of Colas Rail on 9 June 2026



**Jean-Pierre Bertrand**

**Chief Executive Officer**

