

A photograph of three construction workers walking away from the camera on a paved surface. They are wearing white hard hats and bright yellow high-visibility safety vests over blue long-sleeved shirts. The worker in the center has 'Facilities' written on the back of their vest. The worker on the right has 'LOVELL safetyalways' on their vest. In the background, there is a brick building with a sign that says 'castleward commercial' and a construction site with scaffolding under a clear blue sky.

MORGAN SINDALL

GROUP

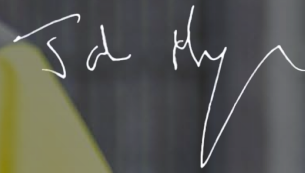
Modern Slavery and Human
Trafficking Statement 2025

About this report

Morgan Sindall Group is committed to upholding the highest standards of human rights throughout our business and across our value chain by treating all people who interact with our divisions with dignity, wellbeing and respect.

This statement, published in accordance with the Modern Slavery Act 2015 ('the Act'), sets out the steps taken by Morgan Sindall Group plc ('the Company') and its subsidiary companies (together 'the Group') during the financial year ended 31 December 2025 to prevent human trafficking and slavery within its direct operations and supply chain. Offences under the Act include slavery, servitude, forced or compulsory labour, and human trafficking for the purpose of exploitation.

This statement is made pursuant to section 54 of the Act and was approved by the Board of Directors of Morgan Sindall Group plc on 24 February 2026.



John Morgan
Chief Executive

For and on behalf of Morgan Sindall Group plc

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This Modern Slavery and Human Trafficking Statement forms part of our annual reporting suite and should be read in conjunction with the following documents:



Annual Report
2025



Gender Pay Gap
Report 2025



Responsible
Business Data
Sheet 2025

Copies of all of our key reports can be found at morgansindall.com

Our business

We are the partnerships, fit out and construction services Group.

The Group operates in the public, regulated and private sectors and reported a revenue of £5bn in 2025. With over 8,500 employees and projects across the UK, we strive to attract and retain the best talent to serve our clients. Our capabilities are aligned with sectors of the UK economy which support demand for affordable housing, urban placemaking and investment in public, commercial and social infrastructure.

Our business model generates cash from fit out and construction services and invest in long-term partnership schemes.

Our divisions

Our divisions are complementary but different, and our decentralised approach enables them to respond quickly to the specific needs of their markets.

Partnerships

Partnership Housing

Revenue

£903m

LOVELL

Partnerships with local authorities and housing associations. Mixed-tenure developments, building/developing homes for open market sale and for social/affordable rent, design and build house contracting, and limited refurbishment.

lovell.co.uk

Mixed Use Partnerships

Revenue

£52m

MUSE®

Transforming the urban landscape through partnership working and the development of large forward-funded multi-phase sites and mixed-use placemaking.

museplaces.com

Fit Out

Fit Out

Revenue

£1,784m



Fit out and refurbishment in commercial, central and local government offices, as well as further education.

overbury.com

Morgan Lovell

Office interior design and build services direct to occupiers.

morganlovell.co.uk

Construction Services

Construction

Revenue

£1,159m

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CONSTRUCTION

Education, healthcare, commercial, industrial, leisure and retail markets.

morgansindallconstruction.com

Revenue

£212m

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PROPERTY SERVICES

Planned maintenance services for social housing and the wider public sector.

morgansindallpropertyservices.com

Infrastructure

Revenue

£935m

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INFRASTRUCTURE

Nuclear, energy, defence, rail, water, highways and aviation markets.

morgansindallinfrastructure.com

BakerHicks

Infrastructure includes the BakerHicks design activities based out of the UK and Switzerland.

bakerhicks.com

➔ Read more about our divisions in our 2025 annual report at morgansindall.com

Our supply chain

We depend on our suppliers to deliver high-quality solutions that exceed the expectations of our stakeholders. By forging close relationships with them, we are building trust and establishing strong standards of business ethics and conduct to secure our supply chain.

As a UK-listed company, we work with thousands of suppliers across the country to secure the materials, services and solutions we need to deliver our projects. With a high percentage of regional small- to medium-sized enterprises accounting for the majority of our procurement spend (2025: 64%), it is vital that we work closely with these partners to establish clear standards of business ethics and conduct.

We also work closely with our Morgan Sindall Supply Chain Family of 423 preferred suppliers and manufacturers. These partners benefit from tailored training, on-site support and dedicated relationship management teams as part of their elevated status. In 2025, 77% of Group spend by value was with Supply Chain Family members with whom we have established clear lines of communication, aligned to a common set of values.

For the purposes of this statement, we treat our joint venture arrangements (where we are responsible for the management and operation of a joint venture) as part of our supply chain. We are committed to collaborating with all project partners to deliver ethically and responsibly while identifying and eliminating all forms of modern slavery.

Further information on our business and supply chain can be found on our website: morgansindall.com.



Our policies

Morgan Sindall Group will not tolerate any form of modern slavery or human trafficking taking place in any part of our business or supply chain. In accordance with the Act, we are committed to respecting the human rights of all people who interact with our business. This ethos is reinforced through our Group policies and Core Values.

Key modern slavery and human trafficking policies

Our Code of Conduct (the 'Code') sets out the behaviours we expect of our people when engaging with our clients, colleagues, suppliers and communities as well as what they can expect from their relationship with the Group. It ensures that all divisions act in line with our Core Values, relevant laws and regulations, industry standards and stakeholder expectations.

The Code is supported by our Human Rights Policy which outlines our alignment to the UN Guiding Principles on Business and Human Rights and the UN Universal Declaration of Human Rights. This includes its principles on inclusion and diversity, non-discrimination and non-harassment, prevention of human trafficking, elimination of forced and child labour, workplace health and safety, freedom of association and supply chain compliance. Furthermore, our Modern Slavery Policy sets out our commitment to preventing all forms of modern slavery across our divisions, subsidiaries, associations and joint venture activities.

Our Supplier Code of Conduct sets out the obligations and responsibilities that we expect of our suppliers, including their alignment to Group standards. The Code requires all suppliers to align to and uphold human rights principles, and to provide fair and equitable working conditions for employees. Suppliers are also obliged to take action to identify and prevent modern slavery within their own operations and supply chain.

All Group policies are regularly reviewed by our management team, including our general counsel and company secretary, head of ESG and sustainability, head of audit and assurance, Group procurement director as well as divisional heads of HR. The Board reviews our annual modern slavery and human trafficking statements and, as part of its review, considers Group actions to mitigate the risk of modern slavery.

Our Core Values

Our Core Values define our culture and drive our purpose to harness the energy of our people to achieve the improbable.

By living our values, we are eliminating risk and acting responsibly to do the right thing.



Read more about our Core Values, policies and processes in our 2025 annual report: morgansindall.com

Due diligence

We recognise the need to undertake rigorous checks to manage risk and mitigate modern slavery throughout the Group. We achieve this through effective supplier screening, onboarding and monitoring.

Prior to engaging in work, our divisions screen all prospective suppliers and subcontractors using detailed prequalification questionnaires (PQQs). These include mandatory questions relating to their practices and performance while requiring additional information relating to our suppliers' environmental, social and governance commitments. Based on the responses received, divisions are able to select suppliers and subcontractors whose compliance standards and terms align with our own.

Our PQQ process is supported by a dedicated supplier onboarding platform which allows us to identify, vet and engage a pool of over 50,000 prequalified suppliers against a range of industry standards, regulations and risk criteria. In doing so, we can mitigate any risks associated with our projects and drive improved supplier performance. We also require higher-risk suppliers to provide additional evidence such as right-to-work eligibility checks and other targeted questions where appropriate. Tier 1 suppliers must be re-accredited every 24 months to ensure ongoing compliance.

Once projects commence, we monitor ongoing compliance through our internal audit programme. The Board's general counsel and company secretary holds ultimate oversight on human rights and modern slavery, including monitoring any concerns raised through our whistleblowing service. We continue to encourage our people and contractors to report any concerns or instances of non-compliance with the law or any of our core policies (see page 5). In 2025, we received 34 reports through our confidential and independently operated whistleblowing service, 'Raising Concerns', and six reports through other channels. Our investigations confirmed that none of the allegations concerned instances of modern slavery within our business or supply chain.

Within our divisions, HR leads and audit managers are responsible for investigating and managing individual cases or causes for concern as appropriate. Divisions are responsible for raising awareness and providing training relating to modern slavery, as well as outlining the steps our employees should take to prevent human rights breaches within our operations (see 'Training' on page 9).



Risk management

We seek to proactively manage any incidents of modern slavery and human trafficking through our risk management process.

While human rights breaches are not considered a principal risk, we recognise that there may be a risk of breach by overseas suppliers at the lower tiers of our supply chain (e.g. within raw materials extraction).

In addition, we recognise the risks associated with the potential use of low-skilled or migrant labour supplied by subcontractors, particularly in areas such as waste management and recycling, cleaning services, demolition, road works and general construction trades. Furthermore, the decentralised structure of our business, the diversity of our activities and the scale of our project portfolio means we may have up to 20,000 subcontractors providing services across our sites and offices each year.

To mitigate these risks, we adopt a multi-layered strategy. Our robust due diligence and risk assessment processes include prequalification criteria, contractual obligations and minimum trading standards; we also provide modern slavery training to our suppliers through the Supply Chain Sustainability School (SCSS) and collaborate with industry organisations, peers and platforms to inform best practice.

In 2025, divisions utilised digital technologies to reduce risk, strengthen compliance and safeguard tenants. For example, digital platforms like Chime were used to track operative skills and qualifications prior to site deployment to ensure that only certified professionals were sent to live jobs. By using facial recognition for on-site identity verification and aligning to the Building Safety Act, this technology, in conjunction with audits, is supporting modern slavery legislation and enforcing fair pay and right-to-work checks.

To mitigate risks associated with product sourcing, we also develop targeted policies for high-risk areas. For example, in 2025, Construction developed a solar panel procurement policy to establish permitted purchase rules and reduce supply chain risk.

By developing and maintaining relationships with our supply chain partners that are built on trust, accountability and transparency, we are better able to determine potential risks and take proactive measures towards mitigating them.

➤ [Read more about our approach to managing risk in our 2025 annual report at morgansindall.com](https://morgansindall.com)



Key performance indicators (KPIs)

We monitor the following KPIs to reinforce efforts to eliminate modern slavery and human trafficking in our business and our supply chain.

Training

Code of Conduct training undertaken by

91%

of employees in 2025
(2024: 81%)

Modern slavery training undertaken by

7,674

of employees in 2024
(2024: 6,578)

Suppliers registered with the SCSS

2,853

in 2025
(2024: 2,835)

Supplier engagement

Suppliers attending training workshops through SCSS

628

in 2025
(2024: 591)

Number of prequalified suppliers

>50,000

in 2025
(2024: >50,000)

Whistleblower reports

Safecall reports received

34

in 2025
(2024: 36)

Number of reports relating to modern slavery

0

in 2025
(2024: 0)



Training

All new employees are required to undertake modern slavery e-learning as part of our mandatory onboarding and induction process.

Training related to modern slavery appears in three e-learning modules run by the Group. It appears in the Group Code of Conduct e-learning, is part of a standalone module and features again in our e-learning on financial integrity. All modules conclude with a test to assess employees’ understanding of how to identify the risks and signs of modern slavery, which they are required to pass.

Our Group general counsel and company secretary is responsible for the creation of the training content, and if an employee fails twice, they are required to undertake additional learning by speaking to their divisional training lead, head of legal service or our general counsel and company secretary to ensure that they fully understand the issues raised. Group training is supplemented by additional divisional-level training for procurement teams, including additional modern slavery awareness training for targeted employees.

For our suppliers, our relationship with the SCSS remains a critical partnership for delivering compliance-related education. At the end of 2025, 2,853 suppliers were actively registered with the SCSS and an additional 628 suppliers attended dedicated training workshops, covering a wide range of sustainability topics including modern slavery training modules.

Modern slavery training conducted in 2025

Who	Format	Trainer	Frequency	Expert input in compiling training
All employees	E-learning	Online	On joining, with refresher course every three years	General counsel and company secretary and external law firm Pinsent Masons LLP
All site workers	Toolbox talk	Site manager/ contracts manager	As determined by the site manager	General counsel and company secretary, Gangmasters and Labour Abuse Authority (GLAA)
Procurement teams	E-learning	Online	Annually	SCSS

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