



M GROUP

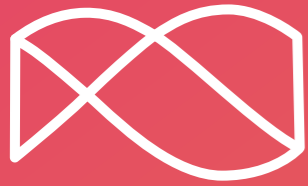
Modern slavery statement

1 April 2025 – 31 March 2026



SLAVE-FREE
ALLIANCE

Working Towards a
Slave-free Supply Chain



M GROUP

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Board approval

The statement has been approved by the Operational Board on 29 June 2026. This statement is reviewed and updated annually.

Andrew Findlay, Chief Executive

Dated: 29 June 2026

Our commitment

This statement sets out the actions we have taken during the financial year 1 April 2025 to 31 March 2026 to understand and mitigate potential modern slavery risks relating to our operations.

We recognise our responsibility in taking appropriate action to combat slavery and human trafficking. Together with our supply chain partners, we are committed to preventing slavery and human trafficking in all its forms.



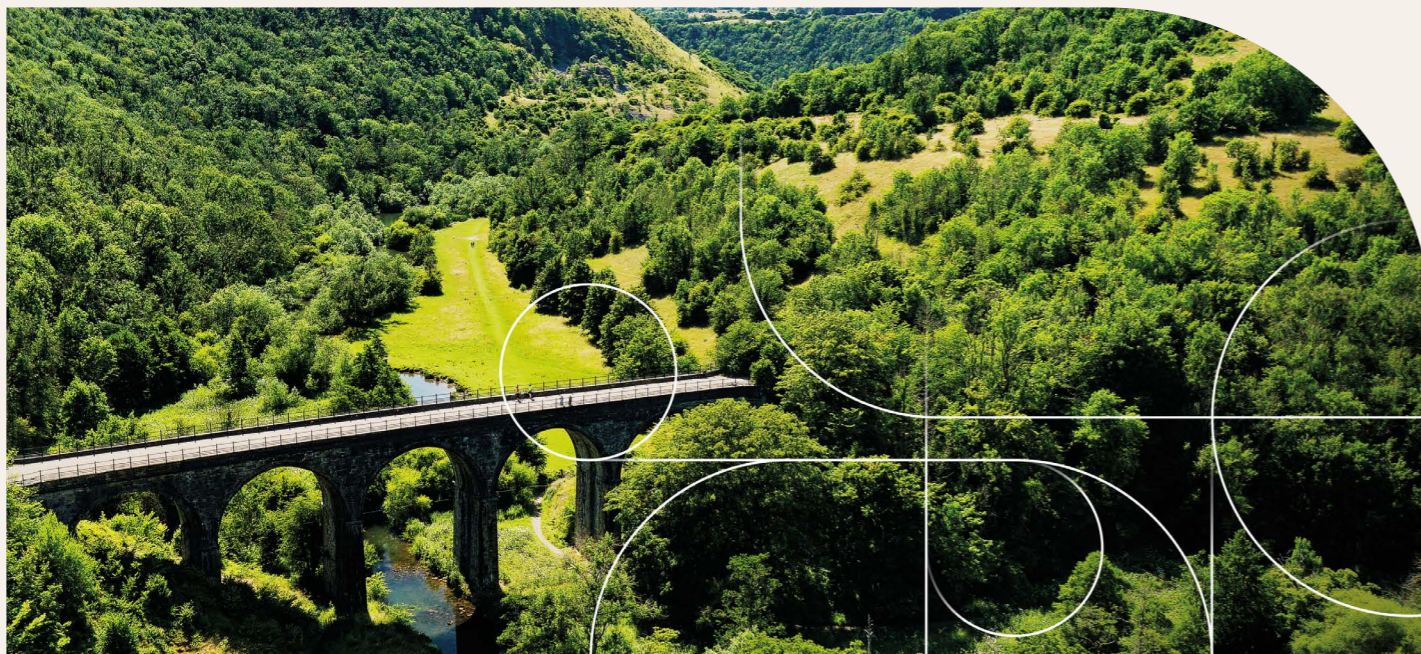
Operating businesses across the Group covered by this statement includes:

Water	M Group Water (Network Infrastructure), M Group Water (MEICA Specialist), M Group Water (MEICA Projects), M Group Water (MEICA Maintenance & Projects), BGEN, Building Engineering Solutions, Norwood Group, BFP Services, Satisfy Recruitment Services
Energy In-Home and Energy Infrastructure	M Group Energy (Agility Eco Services), M Group Energy (Bierce Surveying), M Group Energy (Infrastructure), M Group Energy (Network Infrastructure), M Group Energy (Metering), M Group Energy (Data Insight), Seeka
Technology and Communications (formerly Telecommunications)	M Group Telecom, M Group Telecom (Fixed Network Solutions), M Group Telecom (Technology Services), M Group Telecom (Mobile Network Solutions)
Transport	M Group Transport (Rail & Aviation), M Group Transport (M&E), Antagrade Electrical, M Group Highways
Group	M Group (Services Ltd), M Group (Plant & Fleet Solutions)

Telent acquisition

M Group acquired Telent Technology Services Ltd on 1 August 2025. Following the acquisition, Telent became part of our Technology and Communications division, to better reflect our expanded capabilities. Telent’s supply chain and business processes continue to be integrated with our wider Group processes. For this reporting period, Telent will continue to publish its own Modern Slavery Statement.

Click here to view [Telent Modern Slavery and Human Trafficking Statement](#)



Who we are

We deliver essential infrastructure services across water, energy, transport and telecom, to private and public sector organisations in the UK and Ireland.

14,000+
people

300+
locations

98%
UK-based supply chain

We are a privately owned business with over a century of heritage. Our scale, expertise, and broad capabilities enable us to help keep the country running and support everyday life.

Where we operate

This statement covers all M Group activities. We operate across the United Kingdom and Ireland with limited activities in Europe, Africa and the Falkland Islands on behalf of our clients.

Our purpose of delivering essential infrastructure for life is underpinned by the following values:

Responsible

We’re Responsible and go further for our people, clients, communities and the planet.

Open

We’re Open and seek new and better ways of exceeding expectations.

Together

We’re Together and as one team the whole is greater than the sum of the parts.

Ambitious

We’re Ambitious and embrace opportunity, to lead essential infrastructure services for life.

Our supply chain

Our goods and materials supply partners deliver essential infrastructure products and services, including aggregates, energy and water supply components, electricity and telecom cables, substation components, and specialist equipment. In several cases, our clients provide materials directly on a free issue basis and are responsible for sourcing these through their own supply chain.

We also work extensively with subcontractors and equipment suppliers responsible for service delivery on site.



Risk management

We recognise that, despite a predominantly UK-based supply chain, there remains inherent risk within the extended and often complex global supply chain that provides us with service.

Here are the actions we are taking to mitigate this risk.

Right to work checks

For all direct employees, we carry out Right to Work checks in the UK in accordance with UK government legal guidelines aligned with National Minimum and National Living Wage.

As with all workers, indirect workers must complete a Health and Safety and Contract Induction before they start work. Other checks include verification of their identity, qualifications and capability. The responsibility for ensuring completion of these checks rests with the relevant operating business engaging the worker.

Resourcing policy

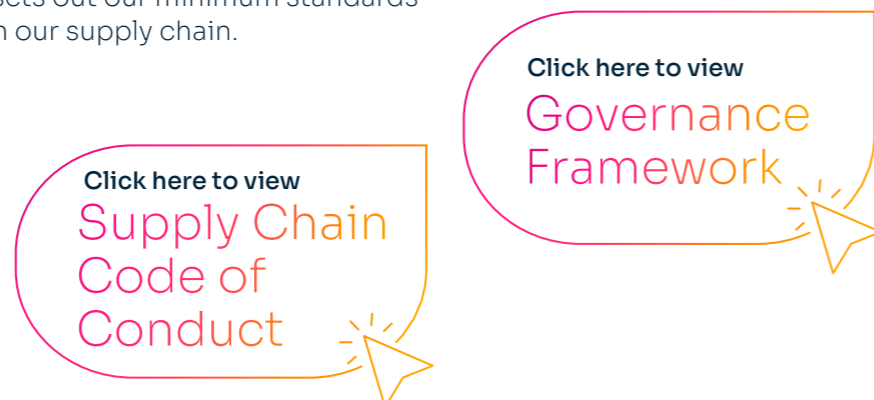
We recognise that any business providing contingent labour and recruitment services presents unique risks.

A managed service provider oversees temporary labour supply, performing regular agency audits to verify their operational processes and protect against modern slavery risks.

Regular compliance checks are carried out to verify that workers are being paid in line with minimum wage legislation, there are no unlawful deductions, and no fees are charged for job placement services.

Code of conduct

Our Governance Framework includes our Human Rights Policy. Our supply chain is expected to adhere to our Governance Framework and our Supply Chain Code of Conduct, which sets out our minimum standards and expectations for all organisations in our supply chain.



Supply chain due diligence

We undertake due diligence when considering taking on supply chain partners and regularly review our existing partners.

Our due diligence and reviews include:

- Evaluating the modern slavery and human trafficking risks of each new partner, based upon geography, category of work, volume and frequency of spend.
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where material risks are identified.
- Taking steps to improve suppliers' practices, including giving advice to suppliers and requiring them to take prompt action.

We previously reported that we've worked with an external agency to audit ethical business practices across our top four PPE suppliers. While these suppliers are UK-registered, the garment industry is recognised as higher potential for modern slavery through its tiers of supply chain, and provision of PPE is a common requirement across our Group.

Audit topics included:

- Recruitment
- Modern slavery
- Right to work
- Wages and benefits
- Rates of pay and work hours
- Business integrity and ethics
- Bullying and harassment
- Occupational health and drug screening
- Freedom of association
- Accommodation and food provision
- Supply chain management

While no instances of modern slavery were found, points for improvement were identified and acted upon. By working with this group, we encouraged trust and built better business practice.

In financial year 2026/27, we plan an external audit programme focusing on materials and electrical component suppliers. This category has broad application across all parts of our Group and is also considered to have higher potential for modern slavery through its tiers of supply chain. Two international suppliers from higher-risk countries and five domestic suppliers are expected to be included.

Our supply chain contracts require our direct supply chain partners to incorporate and adhere to modern slavery standards in their operating practices

We regularly support client-led audits to ensure we meet our responsibilities under this policy and help prevent slavery through effective supply chain management.

Supply chain evaluation

We run a rigorous supply chain evaluation across the Group. Our evaluation procedure now recognises a supplier's achievement of Common Assessment Standard and/or Achilles UVDB B1 or B2 assessment as fully meeting our general onboarding requirements. Taking this approach enables us to give more help and assistance to small and local companies, who can also demonstrate they meet our standards by completing our in-house assessment. All supply chain partners above the

£36m threshold must provide a copy of their Modern Slavery Statement at onboarding and at periodic review or audit.

During the financial year 2025/26, 841 partner organisations completed the process and gained our authorisation to work with us, a reduction from 1,098 in the previous year, as we establish preferred supplier lists and deepen our relationships with strategic vendors to our business.

We're committed to ensuring our supply chain adheres to the highest ethical standards. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with the supply chain to ensure they meet our standards.

We inform our supply chain of our requirements relating to Modern Slavery and ethical business practice and require compliance with our Supply Chain Code of Conduct. Non-compliance may result in remedial action or contract termination.

Governance

Responsibility for our anti-slavery initiatives are as follows:

Policies: Chief People Officer and Chief Procurement Officer

Risk assessments

The Chief People Officer is responsible for assessing the risks for the people aspects of our own business, such as recruitment and employee operations.

The Chief Procurement Officer is accountable for assessing the risk of slavery or human trafficking within the supply chain.

Both aspects are part of our overall Risk Management and Governance process.

We aim to develop more formal risk management measures over the course of FY26/27.

Due diligence

Our Internal Audit function is responsible for carrying out an investigation if a concern is raised (either directly, or via our whistleblowing hotline) supported by the People and Operational teams.

The outcome of the initial investigation will be shared with appropriate members of the Executive Leadership Team to determine the appropriate further course of action.

Where relevant, a remediation process may be enacted to ensure swift and effective action to safeguard human rights and fulfil legal obligations.

As successful remediation requires a victim-led, consultative, and multi-stakeholder approach, the process is applied on a case-by-case basis. We are committed to working collaboratively with all relevant parties to investigate and address any potential instances, ensuring that affected workers are not further harmed during the process.

Collaboration and advocacy

Training

Our policies describe our approach to identifying modern slavery risks and the steps we are taking to prevent slavery and human trafficking across our operations.

All of our directly employed people are required to complete mandatory modern slavery and human rights training annually.

Anti-Slavery Day 2025 – internal communications campaign

To coincide with Anti-Slavery Day 2025, we took the following actions to raise awareness across the Group:

- An internal communications campaign, which included an explanation on what modern slavery is, how to spot signs that modern slavery might be happening and how to report concerns, promoting our whistleblowing hotline.
- Our people were invited to take part in a free webinar hosted by Slave Free Alliance to explore how to support the commitment to drive lasting change against modern slavery.
- We encouraged people to check they are up to date with mandatory training, including anti-modern slavery training, which forms part of our commitment to ethical business practices and complies with the UK Modern Slavery Act 2015.

Engagement with Slave Free Alliance (SFA)

We've joined the SFA membership scheme to access dedicated specialist support to protect against the risk of modern slavery and labour exploitation within our operations and supply chains. This allows us to further develop our understanding of modern slavery risks, share this understanding across the organisation and develop a holistic organisational response.

M Group delegates attended SFA's Ethica 2026 on 17 March 2026 in London, a vibrant international conference bringing together regulators, advocates, technology interests, businesses, and survivors of modern slavery, along with members of Slave Free Alliance, raising and renewing commitment to take action individually and collectively.



Reporting

We encourage our people, clients and supply chain to report any concerns, including those related to slavery or human trafficking risks.

Our whistleblowing procedure is designed to make it easy to make disclosures, without fear of reprimand or retaliation.

Our people, clients and other stakeholders who have concerns can use our confidential helpline provided by Navex Global by calling 0800 890 011.

The whistleblowing hotline is promoted on our intranet and site posters, as well as through our supplier communications, encouraging people to speak up and report any concerns of wrong doing, by either calling the phone number or scanning a QR code. It's featured during Anti-Slavery Day communications. Our supply chain is provided details of how to contact Navex Global in a 'Modern Slavery Useful Resources' document along with the Supply Chain Code of Conduct and key Group policies at onboarding. These are also permanently available in the Supplier News section of their Oracle Supplier Portal for ongoing reference.

In the financial year ending 2025, we received one report of potential concern of modern slavery related to a supplier through our whistleblowing hotline. This report was under investigation at the time of our previous statement. Although the supplier was not in active use in our supply chain at the time, we commissioned an Ethical Business Audit through Achilles. The whistleblowing report was found to be unsubstantiated. There were no reports received during financial year 2025-2026.

Click here to view

[Whistleblowing policy](#)



Continuous improvement plans

- We are committed to continuous improvement of our anti-slavery strategies, including supply chain mapping, stakeholder engagement and regular policy reviews.
- As part of our ongoing efforts to educate on and evaluate the risks of modern slavery, plans are underway for the Procurement team to undertake enhanced Slave Free Alliance training.
- During the first half of Financial Year 2026/27, we will develop new supply chain reporting metrics to be delivered quarterly for our Executive Committee and Divisional Boards. These will include Modern Slavery KPIs and risk reporting.
- We will continue to improve on awareness within our business regarding Modern Slavery risks. One focus for this will be Anti-Slavery Week (12-18 October 2026). We also plan an investigation walk-through with key stakeholders during the fourth quarter, as a rehearsal and a review-in-action of our procedures should a Modern Slavery concern be raised.



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