

Modern Slavery Statement Policy

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Introduction

Totus are committed to conducting our dealings, with the utmost integrity. This statement sets out Totus' actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chain.

Being part of the construction industry, Totus recognises that it has a responsibility to take a robust approach to slavery and human trafficking, both within our directly employed workforce or any of our supply chain.

Totus is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Statement

Totus is committed to conducting all business activities ethically, responsibly and with integrity. We recognise our responsibility to prevent modern slavery and human trafficking within our operations, workforce, subcontractor arrangements and supply chains.

Modern slavery is a criminal offence and a serious violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour, debt bondage, child labour, exploitation and human trafficking.

This policy sets out the steps Totus takes to identify, assess and minimise the risk of modern slavery occurring within our business activities and supply chain. It reflects our commitment to compliance with applicable legislation and industry standards.

Totus adopts a zero-tolerance approach to modern slavery.

Scope

This policy applies to:

- All employees
- Directors and managers
- Agency workers
- Temporary workers
- Contractors and subcontractors
- Consultants
- Suppliers and supply chain partners
- Any party acting on behalf of Totus

All individuals and organisations associated with Totus are expected to uphold the principles contained within this policy.

Organisational Structure and Operations

Totus operates within the construction industry and recognises that the sector may present increased risks associated with subcontracting, labour agencies, temporary labour and complex supply chains.

We recognise our responsibility to identify and address these risks proactively through effective management systems and due diligence procedures.

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Risk Assessment

Totus undertakes regular assessments of modern slavery risks across its operations and supply chain.

Particular consideration is given to:

- Labour-only subcontract arrangements
- Temporary and agency workers
- High-risk supply chains
- Workforce recruitment practices
- Right-to-work verification
- Supplier geographical locations where heightened risks may exist
- High-risk sectors or services

Risk assessments are reviewed periodically and where changes occur in business operations.

Due Diligence and Supply Chain Management

Totus is committed to ensuring that suppliers and subcontractors meet high ethical and labour standards.

Due diligence measures include:

- Supplier pre-qualification questionnaires
- Review of supplier policies and ethical standards
- Verification of workforce arrangements
- Assessment of labour sourcing practices
- Right-to-work compliance checks
- Evaluation of subcontractor management procedures
- Ongoing monitoring of supplier performance

Suppliers may be required to provide evidence of their own modern slavery controls and compliance arrangements.

Where concerns are identified, Totus reserves the right to investigate, require corrective action plans or terminate business relationships.

Recruitment and Employment Practices

Totus is committed to ensuring that all recruitment activities are conducted responsibly.

We will:

- Use reputable employment agencies and labour providers
- Conduct appropriate checks before engaging new agencies
- Verify workers' identities and right-to-work documentation
- Ensure workers are free to work voluntarily and are not subject to coercion
- Monitor labour practices throughout recruitment processes
- Ensure all workers understand terms of employment

Any concerns regarding recruitment practices will be investigated immediately.

Employee Responsibilities

All employees and workers have a responsibility to remain alert to indicators of modern slavery and report concerns.

Potential warning signs may include:

- Workers appearing fearful or withdrawn
- Individuals lacking possession of identification documents
- Signs of coercion or restricted freedom
- Unsafe or exploitative working conditions
- Unusual wage arrangements
- Concerns raised by workforce members or third parties

Failure to comply with this policy may result in disciplinary action.

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Training and Awareness

Totus will provide appropriate training and awareness to employees and relevant personnel.

Training may include:

- Understanding modern slavery risks
- Recognising indicators of exploitation
- Reporting procedures
- Supply chain responsibilities
- Recruitment and labour provider controls

Training requirements will be reviewed periodically.

Reporting Concerns

Employees, workers and supply chain partners are encouraged to report any concerns relating to suspected modern slavery.

Concerns should be raised through:

- Line management
- Human Resources
- Senior management
- Whistleblowing procedures under Policy (Pol) 021

Reports may involve:

- Treatment of workers
- Working conditions
- Recruitment practices
- Suspicious labour arrangements
- Supply chain concerns

Totus encourages openness and supports any person raising concerns in good faith.

No person will suffer detrimental treatment for reporting genuine concerns.

Monitoring and Effectiveness

Totus will monitor the effectiveness of this policy through:

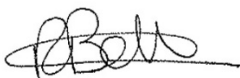
- Internal reviews
- Supply chain assessments
- Audit findings
- Training records
- Incident reporting
- Corrective actions

Continuous improvement measures will be implemented where required.

Governance and Approval

The Board and senior management are responsible for ensuring implementation of this policy and promoting a culture of ethical business conduct.

This statement has been approved by senior leadership and will be reviewed annually.



Richard Bell
Director

Last reviewed May 2026