

## Modern Slavery Statement

### Introduction

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Toppesfield Limited slavery and human trafficking statement for the financial year ending 31st March 2024.

At Toppesfield Limited, we are dedicated to upholding the highest ethical standards and implementing robust governance practices to ensure integrity and objectivity in all our business activities. We are committed to fostering a culture of integrity, transparency, and accountability, which includes our ongoing efforts to prevent modern slavery and human trafficking in every aspect of our operations and supply chain.

### Our Business

Founded in 2004, we have become the UK's largest independent surfacing contractor, delivering projects nationwide across a wide array of sectors. Our services encompass production, surfacing, planing, reinforcement grids, anti-skid applications, and lining for both public and private sector clients. We take pride in delivering specialised, high-quality surfacing solutions tailored to the diverse needs of the industries we serve. Our broad expertise ensures that we offer the most effective and innovative infrastructure solutions, whether in highways, aviation, defence, or leisure. Our unwavering commitment to excellence and sustainability drives us to exceed expectations on every project.

Our turnover for the year ending 31st March 2024 was £127 million.

### Our Supply Chain

Toppesfield engages with a broad range of suppliers and subcontractors to support our operations, most of whom are based in the UK.

We inform our suppliers of their responsibility to comply with our policies and maintain the same high standards as our company. Those involved in procuring new suppliers and subcontracts are aware of the risks associated with modern slavery and our Framework Agreement includes an anti-slavery clause that grants us the right to audit a vendor's books and processes to ensure compliance with all relevant laws and regulations.

Our aim is to foster trust and open relationships with our supply chain partners, collaborating to enhance our efforts in preventing modern slavery and human trafficking. This involves reducing risks and influencing behaviours through review meetings with those identified as higher risk through our assessments.

### Policy

We are dedicated to upholding the highest ethical standards and ensuring integrity and objectivity in our business operations. Our Modern Slavery Policy reflects our commitment to addressing the risk of modern slavery throughout our business.

As an equal opportunity employer, we are focused on fostering a non-discriminatory and respectful work environment for our employees. We provide a safe and confidential platform for employees to report concerns or breaches related to malpractice or misconduct, including issues of slavery and human trafficking, without fear of retaliation.

We regularly provide training on our ethical commitments, and our Code of Conduct is incorporated

into the induction process for new employees and is mandatory for current staff. This training outlines what constitutes modern slavery and emphasizes employees' responsibilities to prevent, detect, and report any instances of modern slavery.

We continuously evaluate our practices and maintain a consistent approach to modern slavery, alongside our commitments to social responsibility, equality, diversity, and transparent operations.

Our SeeHearSpeakUp helpline and app allow employees and other stakeholders to report concerns or seek advice on legal compliance, business ethics, and our Code of Conduct directly with the company. This helpline is available to all employees and third parties with whom we have business relationships, including contractors, customers, and suppliers, if they witness any wrongdoing or wish to raise concerns.

## **Due Diligence and Risk Assessment**

To uphold our commitment to preventing modern slavery and human trafficking in all aspects of our business and supply chain, we have implemented the following measures:

- We conduct thorough due diligence when onboarding new suppliers, which is a key component of our supplier approval and pre-qualification procedures.
- We clearly communicate our zero-tolerance stance on modern slavery to our supply chain and business partners from the beginning of our relationship.
- We proactively identify, monitor, and manage potential risks related to modern slavery within our business and supply chains.
- We ensure fair and transparent recruitment practices, engaging directly with candidates and conducting all necessary pre-employment checks.
- We provide notices at all office addressing modern slavery issues these include providing confidential reporting channels for potential or suspected cases.
- We maintain vigilant monitoring of our whistleblowing channels to detect and address any reports of modern slavery or worker exploitation.
- Our Employee Assistance Programme also provides employees with a secure way of seeking advice about a range of topics including modern slavery or human trafficking issues personally affecting them or their families.

## **Training and Awareness**

We understand that increasing awareness of modern slavery through continuous training is fundamental for identifying and addressing potential risks within our business.

To manage this training, which includes guidance on raising concerns, we use various methods: Employee Inductions for new employees, toolbox talks conducted by management for operational staff, and presentations for those with company-issued devices. For employees without electronic access, we ensure training is delivered in accessible formats. Our statement is also shared via our internal communications channel. This training is conducted twice a year, or more frequently if there are significant changes in our business or relevant legislation.

In 2024-25, we will introduce an eLearning platform featuring a bespoke Modern Slavery module. This initiative aims to further enhance our understanding of modern slavery risks and establish clear objectives for ongoing improvement.

## **Monitoring our Effectiveness**

We recognise that the construction sector is particularly vulnerable to risks associated with modern slavery, and we remain committed to preventing modern slavery and human trafficking. To ensure our Modern Slavery Statement and related measures are effective and responsive to emerging

challenges, we implement policies and procedures reflecting our zero-tolerance approach. Our commitment includes:

- Enhancing awareness of modern slavery and human trafficking through a dedicated e-learning module.
- Continuously improving and mitigating risks within our supply chain by reinforcing our supply chain practices.
- Performing a modern slavery gap analysis across our business and supply chain management to identify and address areas needing improvement.
- Carrying out comprehensive audits of our supply chain each year to ensure compliance with our modern slavery standards and to pinpoint areas for enhancement.
- Regularly reviewing and evaluating supplier practices to ensure they meet our anti-slavery standards and taking necessary actions if any discrepancies are detected.

## Approval

This statement has been approved by the Board of Toppesfield Limited and is signed on its behalf. Our statement will be reviewed and published annually.

A handwritten signature in black ink, appearing to be "Bill Pryor", written over a horizontal line.

Bill Pryor  
Managing Director  
9<sup>th</sup> September 2024