

Modern Slavery and Human Trafficking Statement

July 2026

The SCAPE Group of Companies

The SCAPE group of companies is designed entirely to create value.

Our services include fully performance managed construction, consultancy, civil engineering and utilities frameworks for the public sector and beyond; innovative and iconic design solutions and bespoke property services on behalf of Nottinghamshire County Council.

Our most recent acquisition is designed to support improved economic and environmental outcomes, that can be organically achieved through making the right waste management decisions.



Overview

This statement is made pursuant to S.54 of the Modern Slavery Act 2015 ("the MSA") and sets out the steps taken by SCAPE Group Limited ("SCAPE") and its subsidiary companies^[1] to prevent modern slavery and human trafficking in its (and their) business and supply chains for the financial year ending 31st March 2026.

SCAPE's policy is to conduct its business in an honest, open and ethical manner and to act professionally, fairly and with the utmost integrity in all our business dealings. Accordingly, SCAPE aims to ensure that its supply chains and every part of its business are, and remain, free from slavery and human trafficking.

During this reporting period SCAPE continued its collaboration with its framework partners at National and Regional levels.

In addition to its longstanding commitment to working alongside National Framework partners in the drive to reduce exploitation, Modern Slavery is now also embedded within Civil Engineering and Utilities Framework processes.

This statement has been approved by the Board of Directors of SCAPE and signed by Caroline Compton-James, Deputy Group Chief Executive.

^[1] SCAPE's wholly owned trading subsidiaries on behalf of whom this statement is also given include SCAPE Procure Limited (Company No. 09955814), SCAPE Procure Scotland Limited (Company No. SC584373), SCAPE Venture Limited (Company No. 07710482) Lungfish Architects Limited (Company No.09828111) and Construction Waste Portal Limited (Company No. 13768718).

Policies relevant to slavery and human trafficking

SCAPE operates a number of internal policies with a view to ensuring that it is conducting business in an ethical and transparent manner.

Relevant policies include:

- **Corporate Social Responsibility Statement:** Through this statement, SCAPE acknowledges that its operations will impact upon the economy, society and its employees and is committed to ensuring those effects maximise the positive impacts and minimise the negatives so that the business is run responsibly and in a sustainable manner.
- **Code of Conduct:** The Code of Conduct makes clear the expectation placed on SCAPE employees to maintain the highest standards of conduct and behaviour when representing the organisation; the Code also covering policies relating to the avoidance of conflicts of interest, impartiality, hospitality, political neutrality and whistleblowing.
- **Statement of Ethics:** This clearly demonstrates SCAPE's pride in its reputation for acting fairly and ethically in doing business and the values, commitment and integrity of its employees; the statement also covers the policy relating to anti-bribery and corruption.
- **Anti-Slavery and Human Trafficking Policy:** This policy specifically prohibits activities linked to slavery, servitude, forced labour and human trafficking and sets out exactly what is expected of SCAPE's staff and supply chain in order to prevent it.

Due diligence and steps to assess and manage the risk of slavery and human trafficking in our business and supply chains

In respect of its own operations, SCAPE considered the location of its activities, the roles being performed, the recruitment processes and the absence to date of reports of concerns regarding slavery and human trafficking. SCAPE undertakes "right to work" checks on all its employees prior to them commencing their role. This includes checking, where applicable, that the employee has a valid work visa and is of an appropriate age to work.

Based on these risk assessments, SCAPE deems the risk of human trafficking within its own staff (including agency and contract staff under direct supervision) to be minimal.

As for contractor supply chains, SCAPE's framework procurements are governed by the Public Contracts Regulations 2015 and the Procurement Act 2023, as appropriate, and SCAPE uses a suite of selection questionnaires including PAS 91 and the Common Assessment Standard. These selection questionnaires are supplemented with additional questions as required to establish the steps a bidder has taken to ensure that slavery and human trafficking is not taking place in any part of its business or in any supply chain member.

SCAPE's assessment of a bidder's response considers the information they provide in respect of compliance and the procedures they have in place to meet the requirements under the MSA.

In each of the signed frameworks, contractual clauses are included to address slavery and human trafficking in the supply chain and cover:

- Compliance with the MSA
- Sub-contracting
- Immediate notification of any actual or suspected breaches of the organisation's policies and any actual or suspected slavery or human trafficking of which it becomes aware or has reason to believe has occurred or might occur.

- A warning that failure to comply with these requirements will be deemed to be a substantial failure to comply with the requirements of the framework agreement (substantial failure being capable of occasioning termination).

As a managed framework provider, SCAPE carries out annual audits on all framework contractors. MSA forms part of this annual audit.

As part of the Annual Review process on all Frameworks, SCAPE has a standing question for contractors to confirm they have a modern slavery policy. If SCAPE has reason to believe that a contractor or supplier may have been in breach of its requirements and expectations regarding the use of slave or bonded labour, SCAPE will report this to the Gangmasters and Labour Abuse Authority (GLAA) who will take any appropriate action or offer further guidance.

Training

Over the course of 2025/26, all new starters within the business were provided with the Modern Slavery e-learning module and instructed to read the associated policy as part of their onboarding. Accordingly, [14] new SCAPE employees completed this training in alignment with SCAPE's commitment under this, and preceding, statements.

Responsibility for compliance

The Managing Director of each subsidiary or associated company is responsible for their company's compliance with the SCAPE Anti-Slavery and Human Trafficking Policy and the MSA. The Managing Directors are advised and supported by SCAPE's Heads of Human Resources, Procurement and Legal & Governance.

Objectives for 2026/27

The objectives for 2026/27 are set out below. These incorporate activities across SCAPE and its operations.

SCAPE will:

- Consider the Group Procurement Policy and align it with existing policies as appropriate.
- Continue to deliver training and awareness in relation to modern slavery and labour exploitation across its business.

Approval

This statement was approved by the Board of Directors of SCAPE Group Limited on

31st July 2026

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Caroline Compton-James

Deputy Group Chief Executive

Scape Group Limited