

## Modern Slavery Act Statement

6 April 2026

### Modern Slavery and Human Trafficking Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Wills Bros has taken during the financial year ended 5 April 2026 to prevent modern slavery and human trafficking within our business and supply chains.

### Our Organisation

Wills Bros is a civil engineering and construction contractor delivering infrastructure projects across the United Kingdom and Ireland. Our activities include highways, bridges, marine works, public realm, utilities and other civil engineering projects.

Our supply chains comprise suppliers of plant, materials and equipment, specialist subcontractors, labour providers, professional consultants and other service providers who support the delivery of our projects.

Wills Bros is committed to conducting business ethically, responsibly and with respect for human rights. We have a zero-tolerance approach to modern slavery and human trafficking in any form.

### Our Policies

We are committed to ensuring that modern slavery and human trafficking do not occur within our business or supply chains. This commitment is supported by our policies and procedures relating to ethical business conduct, equal opportunities, whistleblowing, procurement and supplier management.

We expect all employees, subcontractors, suppliers and business partners to maintain the same high standards and to comply with all applicable legislation relating to employment rights, labour standards and human rights.

### Due Diligence Processes

Wills Bros undertakes due diligence measures designed to identify and mitigate the risk of modern slavery within our operations and supply chain. These measures include:

- Prequalification and assessment of suppliers and subcontractors prior to engagement.
- Verification that suppliers comply with relevant employment and labour legislation.
- Inclusion of contractual requirements requiring suppliers and subcontractors to comply with applicable modern slavery legislation.
- Ongoing monitoring of supplier performance and compliance through project delivery and supplier review processes.
- Availability of confidential reporting mechanisms through which employees and stakeholders can raise concerns.

Where concerns are identified, appropriate investigations are undertaken and corrective actions implemented.

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### **Risk Assessment and Management**

The construction sector relies on extensive supply chains, subcontracted labour and the procurement of materials from various sources, all of which may present a potential risk of modern slavery.

Wills Bros assesses these risks through its procurement and supplier management processes and places particular focus on labour-only subcontractors, recruitment practices and higher-risk supply chain activities. We work with our suppliers and subcontractors to ensure that appropriate controls are in place and that any identified risks are effectively managed.

### **Training and Awareness**

Wills Bros provides information, guidance and awareness training to relevant employees on modern slavery and human trafficking. This training helps employees understand the signs of modern slavery, the risks that may arise within the construction industry and the procedures for reporting concerns.

Managers, procurement personnel and those responsible for engaging suppliers and subcontractors are encouraged to remain vigilant and to consider modern slavery risks during procurement and project delivery activities.

### **Measuring Effectiveness**

To assess the effectiveness of our efforts to prevent modern slavery and human trafficking, Wills Bros monitors:

- Completion of supplier due diligence and prequalification checks.
- Compliance with procurement and supplier management procedures.
- Modern slavery concerns or reports received through company reporting channels.
- Corrective actions arising from supplier or subcontractor reviews.
- Completion of relevant employee training and awareness activities.

At the date of this statement, Wills Bros is not aware of any instances of modern slavery or human trafficking within its business operations.

### **Approval**

This statement has been approved by the Board of Directors and will be reviewed annually.



Jonathan Wills  
Director