Ref	PL/008
Version	6

Modern Slavery Policy

Introduction

Universal Group is committed to preventing modern slavery and human trafficking in all our operations and supply chains. We recognize the importance of addressing the risks of modern slavery and human trafficking within our organisation and throughout our supply chain, and we strive to take steps to ensure that both are eradicated.

This statement sets out the steps we have taken to understand and mitigate the risks of modern slavery and human trafficking within our business and supply chains in accordance with Section 54 of the Modern Slavery Act 2015.

Organisational Structure and Supply Chains

Universal Group is a leading contractor for all ground engineering, build, labour and piling plant needs. Universal Group operates as four clear business divisions – Piling, Civils & Build, Resource Solutions and Plant Hire. We operate solely in the UK and work with a range of suppliers across the Civil Engineering, Construction, Highways and Railway sectors.

Our Policy

We are committed to upholding human rights and ensuring that modern slavery and human trafficking do not occur within our business or supply chain. To support this, we have set out and implemented the following policy:

1. **Anti-Slavery and Human Trafficking Policy** – This policy sets out our commitment to ensuring that no form of slavery, forced labour, or human trafficking exists within our supply chains or business operations.

2. **Code of Conduct** – We have a Supplier Code of Conduct which all our suppliers must adhere to, including specific provisions relating to the prohibition of modern slavery and human trafficking.

3. **Whistleblowing Policy** – We have a whistleblowing policy in place to enable employees and third parties to report concerns related to modern slavery and human trafficking in confidence.

Due Diligence Processes

To identify and address potential risks of modern slavery and human trafficking in our supply chains, we undertake the following due diligence activities:

- We commit to assessing any potential risk of modern slavery in our supply chain where reasonable suspicion exists based on factors such as location, industry, operational practices and whistleblowing or other reports.

- We require suppliers to complete a self-assessment questionnaire on their practices related to slavery and human trafficking.

- We engage in intermittent reviews of supplier performance and practices, and internal and external audits and take corrective action if necessary.

Risk Assessment and Management

We recognise that certain regions, industries, and sectors may carry a higher risk of modern slavery and human trafficking. As part of our ongoing efforts, we will continue to assess and monitor our supply chains to identify high-risk areas, and we will work closely with suppliers to mitigate any identified risks.

Training and Awareness

We provide regular training to our employees to ensure they are aware of the risks of modern slavery and human trafficking, and how to identify and report any concerns. We also ensure that our senior management team is fully aware of our obligations under the Modern Slavery Act 2015.

Effectiveness and Monitoring

Ref	PL/008
Version	6

We will monitor the effectiveness of our efforts to combat modern slavery and human trafficking. This includes reviewing our policies and practices, as well as conducting periodic reviews and assessments of our supply chains. Where required, we will take further actions to strengthen our efforts to address these issues.

All staff can also report a suspicion or seek advice by contacting the Modern Slavery Helpline confidentially on 08000 121 700. This is open 24 hours a day, 365 days a year.

Should you wish to remain anonymous you can contact Crime stoppers on

0800 555 111. Always call 999 if there is a crime in action or immediate threat

to life.

This policy will be reviewed annually, as a minimum.

Signed
Richard Lowe
Managing Director

Dated 01/11/2026