



Modern Slavery Statement

Statement pursuant to Section 54 of the UK Modern Slavery Act 2015

Organisation: Coffey Group

Reporting period: 2025

Date approved: 11/02/2026

Introduction

This Modern Slavery Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the steps taken by Coffey Group to prevent modern slavery, forced labour, servitude and human trafficking within its operations and supply chain.

Modern slavery is a crime and a violation of fundamental human rights. It includes slavery, servitude, forced and compulsory labour and human trafficking.

Coffey maintains a zero-tolerance approach to modern slavery and is committed to conducting business ethically, responsibly and with integrity. We are committed to taking appropriate steps to identify, prevent and mitigate risks within our operations and supply chain.

This statement should be read alongside Coffey's Modern Slavery Policy.

Our Business

Coffey is an infrastructure services business operating across Ireland and the United Kingdom, delivering engineering, construction, operations and maintenance services across essential infrastructure sectors.

Our activities are supported by employees, contractors, suppliers and subcontractors who contribute to the delivery of infrastructure projects and services.

Our Supply Chain

Coffey's supply chain supports the delivery of infrastructure projects and services and includes suppliers, subcontractors, contractors, consultants and agency personnel.

As with the wider construction and infrastructure sector, we recognise that modern slavery risks may arise through subcontracting arrangements, labour-intensive activities, temporary labour arrangements and complex supply chains.

We expect all suppliers, subcontractors and business partners to operate ethically and to comply with all applicable employment, labour and human rights legislation.



Policies and Governance

Coffey's Modern Slavery Policy sets out our commitment to acting ethically and with integrity, applying proportionate controls and due diligence, encouraging the reporting of concerns and protecting people who raise concerns in good faith.

Leadership provides oversight of Coffey's approach to modern slavery. People & Culture supports appropriate recruitment, employment, communication and training controls, while Procurement and relevant contract owners support supplier expectations, onboarding and due-diligence measures.

Risk Assessment

Coffey recognises that modern slavery can occur in any industry and supply chain. Our Modern Slavery Policy applies to:

- All employees.
- Contractors, consultants and agency staff.
- Suppliers and subcontractors where Coffey can set expectations through procurement and contract management.

Coffey seeks to manage these risks through proportionate employment and workforce controls, supplier and subcontractor onboarding, due diligence, employee awareness and reporting arrangements.

Due Diligence and Controls

Coffey applies controls designed to support lawful and ethical employment practices. Right to Work checks are conducted for employees, and site inductions include worker verification.

Suppliers and subcontractors complete a pre-contract supplier questionnaire as part of Coffey's onboarding and prequalification arrangements.

Coffey operates whistleblowing and reporting arrangements through which concerns relating to unethical conduct, labour exploitation or modern slavery may be raised.

Leadership provides oversight of modern slavery risk management. Managers are expected to remain alert to indicators of exploitation and to escalate concerns appropriately. Procurement and relevant contract owners support the application of supplier expectations and proportionate due-diligence measures.

Training and Awareness

During the reporting period, UK colleagues were assigned mandatory digital training covering Ethics in the Workplace, the Code of Conduct and Diversity, Equality and



Inclusion. At the time the completion data was provided, completion rates were 62% for Ethics in the Workplace, 72% for the Code of Conduct and 67% for Diversity, Equality and Inclusion.

Completion levels have been shared with the UK Senior Leadership Team. Coffey recognises the need to improve participation and will continue to promote completion of mandatory training and strengthen modern slavery awareness proportionate to role and risk.

Reporting Concerns

Any actual or suspected instance of modern slavery connected with Coffey's operations or supply chain must be reported promptly through management, People & Culture or Coffey's whistleblowing arrangements. Concerns raised in good faith will be handled appropriately and without retaliation or detrimental treatment.

No modern slavery incidents or concerns were reported during the reporting period.

Effectiveness and Continuous Improvement

Coffey reviews its approach through policy review, training participation, workforce controls, supplier onboarding, supplier reviews and the monitoring of reported concerns. During the reporting period, Coffey reviewed its Modern Slavery Policy, assigned mandatory digital training in the UK, continued to operate Right to Work and worker-verification controls, and undertook supplier audits or reviews. No modern slavery incidents or concerns were reported.

The current UK training completion rates indicate that further follow-up is required. Coffey will continue to promote completion, strengthen awareness and develop proportionate supplier due-diligence and risk-management arrangements.

Board Approval

This Modern Slavery Statement has been approved by the Board of Directors of Coffey Group and will be reviewed and updated annually.

Signed on behalf of the Board of Directors of Coffey Group.

A handwritten signature in blue ink, appearing to read "Odrian Madden", written over a horizontal line.

Odrian Madden
Chief Executive Officer
Coffey Group
Date: _11/02/2026____