



Modern Day Slavery Act Policy	
CPY-GN-025	Page 1 of 2
REV 08	DATE: 11/02/2026

Modern Slavery Policy

Modern slavery is a serious crime and a violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour and human trafficking. Coffey has zero tolerance for modern slavery. We are committed to conducting business ethically, responsibly and with integrity and to taking proportionate steps to identify, prevent and mitigate modern slavery risks within our operations and supply chain.

This policy applies to all employees, workers, agency staff, contractors and consultants working for or on behalf of Coffey. We also expect suppliers, subcontractors and business partners to comply with applicable employment, labour and human rights legislation and to take appropriate steps to prevent modern slavery within their operations and supply chains.

Coffey is committed to:

- Acting ethically and with integrity in all business relationships.
- Complying with applicable legal requirements.
- Not knowingly supporting or conducting business with any organisation involved in modern slavery.
- Maintaining lawful and transparent recruitment and employment practices.
- Applying proportionate risk-based controls within our operations and supply chain.
- Encouraging the prompt reporting of concerns.
- Taking appropriate action where concerns or non-compliance are identified.

Responsibilities

Leadership is responsible for providing appropriate oversight of this policy. Managers must communicate the policy, remain alert to potential indicators of exploitation and escalate concerns appropriately. People & Culture is responsible for supporting appropriate recruitment, employment and workforce controls. Procurement and relevant contract owners are responsible for communicating supplier expectations and applying proportionate onboarding, due-diligence and contract-management controls.

Coffey will communicate this policy through appropriate business channels and provide modern slavery awareness or training proportionate to role and risk, particularly for colleagues involved in recruitment, procurement, supplier onboarding, contract management and operational supervision.

Everyone working for or on behalf of Coffey must comply with this policy and report any actual or suspected instance of modern slavery.

Due Diligence and Controls

Coffey will apply due diligence and controls proportionate to the nature and level of modern slavery risk. These may include lawful recruitment and employment checks, workforce onboarding and induction, supplier and subcontractor prequalification, requests for relevant policies or commitments, risk-based review of supplier responses, communication of Coffey's expectations and appropriate contractual, corrective or escalation measures.

Reporting Concerns



Modern Day Slavery Act Policy	
CPY-GN-025	Page 2 of 2
REV 08	DATE: 11/02/2026

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.

No person raising a genuine concern in good faith will be subject to retaliation or detrimental treatment. Coffey will assess reported concerns promptly and take appropriate and proportionate action. This may include investigation, escalation to senior leadership, engagement with the relevant supplier, subcontractor or business partner, corrective action, suspension or termination of a relationship, and referral to the appropriate authority where required.

In determining its response, Coffey will seek to avoid actions that could unintentionally increase the risk of harm to people who may be affected.

Review

This policy will be reviewed at least annually, or sooner where there are significant legislative, organisational or risk changes.

This policy supports, but does not replace, Coffey's annual Modern Slavery Statement.

Signed: 

Odran Madden

Chief Executive Officer

Date: 11/02/2026