

POL020 Modern Slavery Statement

Organisation structure and supply chains

This statement is made on behalf of Everlast Group Ltd pursuant to section 54(1) of the Modern Slavery Act 2015 and has been formally approved by the Board of Directors. It covers the financial year from 1 June 2025 to 31 May 2026 and applies to Everlast Group Ltd and its subsidiary undertakings: Everlast Waterproofing Ltd, Everlast Rail Ltd, Everlast Scaffolding Ltd and Everlast Specialist Surveys Ltd (collectively, “we”, “us”, “our”, “Everlast” or the “company”).

Everlast is committed to preventing modern slavery and human trafficking in all its forms. We recognise our responsibility to uphold human rights, ethical labour practices, transparency and accountability across our operations and supply chain.

Our business works with contractors, subcontractors, specialist installation teams, local subcontractors, suppliers of waterproofing membranes, sealants and coatings, and logistics partners. We do not knowingly work with any organisation that supports or is involved in slavery, servitude, forced or compulsory labour.

Policies in relation to slavery and human trafficking

We maintain HR policies and processes designed to protect employees, workers and labour-only contractors against modern slavery and trafficking, including employment conditions, grievance reporting, non-discriminatory hiring, right to work checks and expected workplace behaviour. Right to work verification is conducted in accordance with Home Office requirements before an individual commences work and forms an important part of our controls to prevent illegal working, labour exploitation and modern slavery.

Our supporting policies include the Modern Slavery Policy, Code of Conduct Policy, Whistleblowing Policy, Anti-Bribery and Corruption and Anti-Fraud Policies, Positive Work Environment Policy, Equal Opportunities and Discrimination Policy, Diversity and Inclusion Policy, Recruitment Policy, Code of Practice for Subcontractors and Supplier Diversity Policy. These set expectations on ethical conduct, reporting concerns, workplace respect, anti-discrimination, financial crime prevention, subcontractor standards and supplier engagement.

Due diligence, risk assessment and management

Our due diligence approach considers modern slavery alongside climate change, bribery and corruption, cyber security and health and safety risks. Everlast operates in line with UK tax, employment and health and safety requirements and conducts pre-qualification checks on subcontractors before engagement, including credentials, previous work and commitment to ethical practices.

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We rely on long-standing relationships with key subcontractors and suppliers, contractual clauses prohibiting modern slavery, forced labour and human trafficking, site inspections and audits, and confidential reporting arrangements. Where modern slavery or trafficking is identified or suspected, we will take appropriate and proportionate remedial action, which may include engagement with affected parties, suspension or termination of supplier relationships and reporting to relevant authorities.

Recruitment: written contracts, no worker-paid recruitment fees, right to work checks, confirmation of identity and address, information on statutory rights and escalation through HR/Safeguarding Lead where exploitation is suspected. Right to work checks are completed before employment begins using the appropriate Home Office approved method, including online checks for individuals holding digital immigration status (eVisas), manual document checks where permitted, and follow-up checks where an individual's permission to work is time limited.

Agencies: use of agreed reputable agencies only, with checks on background, reputation, work documentation and assurance that appropriate checks have been completed; approved agencies are reviewed at least every two years.

Subcontractors and supply chain: modern slavery statements requested where applicable; contractors required to confirm that appropriate right to work checks have been completed on personnel supplied to Everlast; labour-only contractors are subject to identity and right to work verification before they are permitted to undertake work on our sites; and records are maintained as part of our onboarding process. Tier 1 supplier due diligence remains a priority improvement area.

Training and Awareness

Everlast continues to raise awareness of modern slavery, forced labour and child labour. Training is provided to new employees, to those involved in recruitment and supply chain management, through induction, mandatory 5mins.ai training, the Supply Chain Sustainability School and informal supervisor and manager briefings.

Employees involved in recruitment, onboarding, labour engagement and supply chain management receive guidance on recognising indicators of labour exploitation and modern slavery, including circumstances where right to work documentation may be fraudulent, inconsistent or indicative of worker vulnerability.

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Key performance indicators to measure effectiveness of steps being taken

In the 2026 financial year we have had no reports of issues with modern slavery or forced labour within our workforce or supply chain.

In the past year we have:

- Continued to request modern slavery statements for all new approved subcontractors.
- Delivered 78 training resources on Modern Slavery through 5Mins.ai.
- Included Modern Slavery in our company and site inductions.
- Confirmed right to work checks for our labour only supply chain

Continuous improvement and next steps

Everlast is committed to continuously improving our practices to combat modern slavery. We will regularly review and update our policies and procedures to reflect best practices and regulatory requirements. In the coming year we will:

- Publish this statement prominently on our website with a clear homepage link.
- Review approved subcontractor records and Tier 1 supply chains to identify modern slavery risks and request relevant policy and statement information.
- Update subcontractor terms, continue right to work verification checks, monitor compliance with eVisa requirements, strengthen labour-only contractor onboarding controls, promote supplier and contractor awareness, and encourage more employees to complete modern slavery training modules.

Everlast Group Ltd is committed to preventing modern slavery and human trafficking within its operations and supply chains and to maintaining ethical and responsible business practices. We welcome feedback from stakeholders and encourage open dialogue on this important issue.

This Statement was approved by the Board of Directors of Everlast Group Ltd and will be reviewed annually and updated as necessary to reflect changes in the Company's operations, risk profile, policies or legal obligations relating to modern slavery and human trafficking.

Mike Hunter
Managing Director
On behalf of the Board of Directors