

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT 2025

Foreword

Lowery is opposed to all forms of trafficking, slavery, forced or compulsory labour, and all other forms of modern slavery and human trafficking.

Our organisation works in full compliance with all applicable UK acts, Procurement Notices and international human rights standards, labour and employment laws, rules, and regulations. Lowery works to mitigate the risks of modern slavery and human trafficking in our business operations and supply chains.

Lowery is committed to making a positive impact as a business and to protect those who may be affected by all forms of potential modern slavery and human trafficking in the supply chain.

OFFICIALLY SIGNED

Signature Redacted for Security purposes

Mark Gubbins, Managing Director

Organisation Structure and Supply Chains

Founded in 1950, Lowery is a UK-based and focused supplier of specialist traction power, electrification, signalling and civil and track turnkey services to the broader UK rail industry with additional activities in related power and renewable transition capabilities.

Our customers are infrastructure owners or their Tier 1 contractors.

We are committed to acting ethically as a business, aligning ourselves with ISO24001 (sustainable and ethical procurement), the 2015 Modern Slavery Act and PPN 05/19.

Policies In Relation to Slavery and Human Trafficking

Lowery Policy HR-PO-16, co-owned by our HR and Operations departments, sets out our policy in relation to Modern Slavery and Human Trafficking.

The Company has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any part of our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015, Company Policy HR-PO-11 Ethical Procurement, and fundamental human rights as set out by the principles of the International Labour Organisation and the United Nations Guiding Principles.

We expect the same high standards from all of our contractors, suppliers and other

business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Due Diligence Processes

Lowery Group Limited conduct right-to-work checks of our workforce in accordance with the Immigration, Asylum and Nationality Act 2006 and expects all suppliers to carry out these checks for their workforce.

Our HR-PR-04-F3 process vets our supply chain for their own modern slavery practices. The process validates supply chain partners against PAS91 criteria, a standardised pre-qualification questionnaire developed by the British Standards Institute (BSI). Our RA-PR-29 Subcontractor Performance Process regularly re-visits and re-verifies this compliance on a regular basis.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director as soon as possible. Anonymous reporting can also be made through the railway Confidential Incident Reporting and Analysis System (CIRAS).

Risk Assessment and Management

Risk is assessed on a company-wide and per-project basis through methods including:

- Supply chain search, vetting and onboarding
- Employee onboarding
- Leadership engagement tours
- HSQE / Commercial audits

As much of our work is delivered on behalf of Tier 1 construction companies, we are further subject to a variety of audits from those employers.

The majority of our services are deemed specialist and do not sit within the UK's high-risk construction categories for modern slavery and human trafficking.

Key Performance Indicators to Measure Effectiveness of Steps Being Taken

Primary KPIs which measure the effectiveness of our monitoring and education include:

- Close Call / Near Miss analysis – used internally as anonymous reporting; numbers and trends
- Supply Chain Vetting and Audit analysis – insight and any concern
- Numbers of inductions, onboardings and refresher training volumes and hours – delivered to maintain awareness and practice.

Training on Modern Slavery and Trafficking

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and all employees.

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Tool-box talks and digital education modules are used frequently throughout the business to ensure knowledge and good practice is kept up-to-date.

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Anthony Harrison, Company Secretary