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## MODERN SLAVERY STATEMENT

### 1. INTRODUCTION

This statement is made by Collen Construction Group Limited (“**Collen**”) on behalf of the Collen group of companies and serves as our Modern Slavery Statement for the year ending 2024. For the purposes of compliance with Section 54 of the Modern Slavery Act 2015, it is acknowledged that the group includes Collen Construction (UK) Limited, a company incorporated and registered in England and Wales.

### 2. ABOUT COLLEN

Collen is a family-owned, international construction company with a proud heritage dating back to 1810. Over the course of more than two centuries, Collen has established itself as a trusted leader in delivering high-quality, complex construction, fit-out, and engineering solutions.

Operating across Ireland, the United Kingdom, and mainland Europe, Collen serves a wide range of sectors, including data centres, commercial, residential, healthcare, pharmaceutical, life sciences, and power generation. The company is particularly recognised for its ability to execute technically demanding projects in live and mission-critical environments, consistently meeting the needs of its clients.

Collen is committed to excellence, innovation, and sustainable practices across all aspects of its operations, upholding the highest standards of ethical conduct and corporate responsibility by embedding strong governance, environmental sustainability, and responsible supply chain management into its business model.

### 3. OUR COMMITMENT TO THE PRINCIPLES OF THE MODERN SLAVERY ACT 2015

Collen is firmly committed to conducting all business operations with integrity and in full compliance with applicable laws, including the UK Modern Slavery Act 2015 and equivalent international standards. Our recruitment and human resource management policies are rigorously designed to ensure that all individuals engaged by Collen, whether directly or indirectly, are lawfully entitled to work in the relevant jurisdiction.

In addition to compliance, these procedures are structured to mitigate the risk of exploitation, coercion, or abuse in any form. We implement due diligence processes to identify, prevent, and address any potential instances of modern slavery or human trafficking within our operations and supply chains.

Collen maintains a strict zero-tolerance policy towards modern slavery, servitude, forced or compulsory labour, and human trafficking. We do not engage with or maintain relationships with any individual, entity, or organisation, whether in the United Kingdom or otherwise, that is known or reasonably suspected to support, condone, or participate in such unlawful practices.

This commitment extends to our suppliers, contractors, and business partners, who are expected to uphold the same high ethical standards. Where necessary, we reserve the right to terminate any relationship or contract in which evidence of non-compliance is identified.

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#### **4. DUE DILIGENCE ON OUR SUPPLY CHAIN**

As part of Collen's commitment to ethical business practices and compliance with the UK Modern Slavery Act 2015, we maintain rigorous pre-qualification and due diligence procedures for all sub-contractors and suppliers engaged across our operations.

Regardless of jurisdiction, all prospective sub-contractors and suppliers are required to undergo a comprehensive due diligence and vetting process as part of Collen's pre-qualification procedures. Approval is granted only to those who satisfy our compliance criteria and can demonstrate a clear commitment to Collen's ethical, legal, and operational standards.

To support enforcement of these standards on our project sites, Collen operates a comprehensive induction system. This system requires sub-contractors to submit key employee information before site access is granted. It ensures that those working on Collen's projects receive essential site-specific and compliance-related information prior to mobilisation.

#### **5. POLICY FRAMEWORK AND TRAINING**

Collen maintains a comprehensive framework of policies designed to prevent and mitigate the risks of modern slavery across our operations and supply chain. These policies are embedded into our operational practices and form a core part of our governance structure, ensuring the protection of human rights for all individuals working for or with us, whether through direct employment or third-party engagement.

We are committed to operating with integrity, transparency, and accountability. To reinforce this commitment, we engage actively with our supply chain partners and internal teams to promote ethical conduct and reduce the risk of exploitation at every level of our operations.

In addition to our dedicated Modern Slavery Policy, the following policies support our approach to ethical business conduct and responsible labour practices:

- Anti-Bribery & Anti-Corruption Policy;
- Business Ethics & Integrity Policy;
- Protected Disclosures (Whistleblowing) Policy;
- Anti-Money Laundering Policy; and
- Conflicts of Interest Policy.

To further strengthen awareness and compliance, Collen delivers targeted training to employees and key stakeholders. This includes induction and refresher training on modern slavery risks, ethical conduct, and whistleblowing procedures. The training is designed to equip individuals with the knowledge and tools necessary to identify, report, and respond to any concerns relating to unethical or unlawful practices, including indicators of modern slavery.

#### **6. ONGOING COMMITMENT AND GOVERNANCE**

Collen is committed to taking all reasonable and proportionate measures to prevent any form of modern slavery, servitude, forced or compulsory labour, and human trafficking within our organisation and across our



supply chains. Our risk management approach to modern slavery is dynamic and continually evolving to reflect emerging legal requirements, industry best practices, and insights gained through ongoing due diligence and operational experience.

We will maintain and strengthen the initiatives outlined above throughout 2024 and beyond, reinforcing our zero-tolerance stance on exploitation and unethical labour practices. Collen accepts full responsibility for the implementation of this statement and the achievement of its objectives.

This statement will be reviewed annually and updated as necessary to reflect our continued commitment to ethical business conduct.

Signed: *Kara Stuart*

**Kara Stuart**

**Chief Executive Officer**

Date: 16 June 2025