



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT
of RSK Group Limited & its subsidiaries
for the Financial Year ending 31 March 2026

The UK Modern Slavery Act 2015 requires certain businesses to publish an annual statement setting out the steps they have taken in the previous financial year to address and prevent modern slavery and human trafficking in their own operations and supply chains.

RSK Group Limited and twelve of its subsidiaries, RSK Environment Limited, Binnies UK Limited, W.G.M (Engineering) Limited, MWH Treatment Limited, PD&MS Energy (Aberdeen) Limited, RSK ADAS Limited, WysePower Limited, C.R. Civil Engineering Limited, R.J.T Excavations Limited, Richard Irvin FM Limited, Octavius Infrastructure Limited, Pensar Construction Group Pty Limited and Atlantic (Aust) Pty Ltd Trading as Adenco are obliged to publish such a statement. RSK Group Limited, as parent company, is publishing this statement on behalf of itself, RSK Environment Limited and all its subsidiaries (the **RSK Group**), with the exception of MWH Treatment Limited which publishes its own statement. This statement covers the reporting period 1 April 2025 to 31 March 2026 and is intended to meet reporting expectations in both the UK and Australia, including describing how we consult with entities we own or control and how we assess the effectiveness of our actions. The RSK Group [legal structure chart](#) is available at www.rskgroup.com.

RSK ORGANISATIONAL STRUCTURE & SUPPLY CHAINS

We are a multidisciplinary consulting and technical services group of companies providing specialist environmental, engineering, health and safety support services. RSK is headquartered in the UK but operates globally. We employed approximately 17,000 people worldwide at the end of March 2026. Our network of over 300 offices spans the UK, continental Europe, the Middle East, Asia Pacific, Africa and South America.

Our subsidiaries and operations are split into seven divisions: Asia Pacific, Middle East & Africa, Europe and Latin America, UK Engineering and Design Consulting, UK Environmental Consulting, UK Testing, Inspection, Certification and Compliance, UK Environmental Solutions and Business Support. Together they deliver a broad range of services, primarily within the following:

Our Markets	Our Services
• Water • Energy • Infrastructure • Natural & built environment	• Environmental consulting • Engineering and design consulting • Environmental solutions • Testing, inspection, certification and compliance

RSK Group relies on a complex and extensive supply chain network that spans globally. Based on our most recent supply chain human rights risk assessment, we source from approximately 17,000 suppliers across the Group. Our supply chain footprint covers a diverse range of products and services, we are dedicated to upholding ethical standards and responsible practices are upheld throughout our network.



The RSK Group board of directors has overall responsibility for compliance with our legal and ethical obligations, and for overseeing adherence to these requirements by all those under its control adhere to these requirements.

The board of directors of each subsidiary within the RSK Group is responsible for taking all reasonable and practical steps to prevent modern slavery and human trafficking within its operations and to support compliance by all those working for or on its behalf. This includes monitoring the effectiveness of those steps, responding to queries, and reviewing internal compliance controls and procedures. This also extends to businesses outside the UK, including identifying where local legal or cultural requirements differ from this statement and the Human Rights and Modern Slavery Policy, and reflecting those differences where appropriate while maintaining equivalent legal and ethical standards.

RSK Group's anti-slavery approach is supported by an Anti-Slavery Working Group, which meets at least every other month and comprises representatives from relevant business functions, including sustainability, procurement, human resources, legal and operational teams. The Working Group supports the ongoing development of the Group's approach to preventing, identifying and addressing modern slavery risks, including reviewing emerging risks, actions and priorities. Key risks, actions and progress are reported to senior management through the RSK Group governance cycle.

CONSULTATION

This statement has been prepared through consultation across RSK Group, including with entities specifically we own or control and those covered by this statement. During the reporting period, the Group Sustainability and Compliance teams coordinated data gathering and draft content, which was reviewed with relevant subsidiary leadership (including procurement, Human Resources (HR) and operational leads) to confirm the accuracy of disclosures, agree priority risks and actions, and support reflection of local practices are reflected while meeting consistent Group standards.

RSK ORGANISATIONAL POLICIES

We recognise that modern slavery, forced labour and human trafficking are serious human rights violations. We are committed to implementing and maintaining effective systems and controls to help prevent these risks from arising anywhere in our organisation and supply chains. Where issues are identified through our due diligence processes, we are committed to working with relevant stakeholders to support remedy for those affected and to prevent recurrence. Our approach is intended to raise awareness, reinforce the importance of respecting and promoting human rights, and supporting reasonable steps to prevent and address harm. Our commitment to the protection of human rights is embedded in our [Ethics Code](#), [2030 Second Nature Sustainability Strategy](#), [Sustainability Policy](#), [Procurement Policy Statement](#) and Global Supply Chain Code of Conduct.

We also maintain an [Equality, Diversity and Inclusion \(EDI\) policy statement](#) and a [Harassment Policy Statement](#), alongside relevant HR policies including our [Recruitment policy statement](#) and right to work procedures. Together, these policies and procedures support fair, inclusive and accessible recruitment and employment practices, promote equal opportunity and respectful behaviour in the workplace, and help confirm that discrimination, harassment, bullying and other inappropriate behaviour are not tolerated and



can be identified and addressed appropriately. Our recruitment and related HR procedures are intended to support merit-based hiring, transparency, accessibility and appropriate employment checks, while our EDI and harassment policies set clear expectations for dignity, inclusion, respectful behaviour and safe reporting of concerns. We also require staff to complete mandatory harassment training, which is refreshed annually.

Our Human Rights and Modern Slavery Policy has been developed in line with the United Nations Universal Declaration of Human Rights, the International Labour Organization's Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. It sets out our position on combatting slavery, forced labour and human trafficking, and on respecting human rights in our organisation, supply chains and the communities connected to our work. The policy was developed through consultation with colleagues from Human Resources, Procurement, Sustainability (within which the human rights function sits), and Legal to reflect relevant business function and practical operational considerations. Our expectations include responsible recruitment and fair employment practices, including that workers should not pay recruitment fees, that identity documents should not be retained, and that workers should be free to leave employment subject to applicable law and contract terms. We also expect suppliers and subcontractors to uphold these principles and to cascade appropriate expectations through their own supply chains.

The policy is communicated through a range of channels, including internal communications and training, as part of the supplier evaluation process and through supplier-facing platforms such as our supplier portal and Achilles, where relevant suppliers are asked to confirm they have read, understood and agree to the applicable requirements.

These policies are reviewed annually, and we continue to assess their effectiveness and update them where appropriate.

Awareness and understanding of the Group's Whistleblowing Policy and procedure is promoted to all employees, suppliers, contractors and other stakeholders through our Ethics Code and related training. Our whistleblowing training module, which forms part of induction for new employees and is available through our learning platform, provides guidance on how to report concerns relating to human rights, slavery, forced labour and human trafficking. We are also working to improve the accessibility of key policies and procedures, including making selected documents available in multiple languages.

DUE DILIGENCE PROCESSES & RISK ASSESSMENT

Our due diligence approach is risk-based and focuses on identifying, assessing and addressing actual and potential human rights impacts, including modern slavery, within our organisation and supply chains. During the financial year ending 31 March 2026, we continued to align our approach with the United Nations Universal Declaration of Human Rights, the International Labour Organization's Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Our due diligence activities are intended to help us identify higher-risk areas, prioritise action based on the severity of potential impacts on people and our ability to influence outcomes, and strengthen the effectiveness of our controls over time.

As part of this approach, we undertook a Group-wide human rights risk and gap assessment in FY25, led by the Sustainability team, which informed due diligence decisions taken in FY26. The assessment is intended



to be repeated every two to three years, or sooner where significant changes occur that warrant further review. Its purpose is to help RSK Group identify the business units and activities with the highest risk of human rights impacts, including modern slavery, assess the effectiveness of the Group's existing human rights and modern slavery programme, identify gaps in current processes, and inform a Group-wide action plan.

The assessment identified a number of priority actions for FY26, including enhancing our modern slavery awareness training, conducting further due diligence into labour provision supply chains, developing key performance indicators relating to human rights performance, and improving access to and communication of grievance mechanisms. Further details of how we accomplished these are found in the "Measuring Effectiveness" and "Training and Awareness" sections of this statement.

In our organisation

All RSK Group employees are recruited in accordance with clear HR procedures designed to verify their right to work and comply with local legislation. These procedures include checks on eligibility to work in the host country, references, proof of a National Insurance Number (where applicable in the UK) and bank details. Additional assurance is obtained through audit processes, which provide further verification that these requirements have been met.

Binnies UK Limited has now completed the process to become an accredited Real Living Wage employer, joining MWH Treatment Limited as an accredited Real Living Wage employer and reflecting their shared commitment to fair pay and responsible employment practices.

All employees are required to complete the Company induction which includes a specific online awareness training module in respect of combatting slavery and human trafficking, which they are required to refresh at regular intervals. This training was updated in FY26 to focus on wider human rights issues and practical guidance on how to spot and report potential concerns. Alongside this, our Human Rights and Modern Slavery Policy sets out our position in respect of slavery, forced labour and human trafficking and, together with the training, helps employees and anyone acting for or on behalf of the RSK Group to understand what modern slavery is and what our responsibilities are in respect of the prevention, detection and reporting of modern slavery in our business and supply chains.

We have a Whistleblowing policy for individuals to raise concerns which is made available to all employees, suppliers, third parties and stakeholders, whether this is directly to a line manager, point of contact within the group or our externally accessible email address. This is accompanied by a corresponding online training module which is available to all employees.

In our supply chains

RSK Group spends over £1.3 billion each year on goods, services and raw materials to support the running of the business and the delivery of its projects.

Goods and services are predominantly procured locally by the relevant RSK Group business, following prescribed supplier evaluation and purchasing procedures which are monitored by senior management. Achilles are our primary method of supplier evaluation at Group level and we are working to scale-up the



number of suppliers enrolled. Our current risk assessment in respect of modern slavery and human trafficking focuses on country of operation and business activity.

Where appropriate, we use supplier qualification and assessment processes (including third-party platforms such as Achilles) to assess whether suppliers meet our minimum expectations set out in our Global Supply Chain Code of Conduct and related contractual requirements.

In FY26, RSK Group continued to strengthen and expand its Global Supply Chain Code of Conduct. This comprehensive framework reinforces our commitment to ethical practices across our supply chain, supporting alignment with international standards and safeguarding against modern slavery risks. Building on a regional-specific version for the UK, in FY26 the Code was further developed and extended to include regional specifics for Australia & New Zealand (ANZ) and Mainland China & Hong Kong (HK), reflecting regional requirements while maintaining alignment with RSK Group's overarching standards and expectations. In FY27, we plan to create a Republic of Ireland (ROI) regional specific version and identify other regions to target next.

This expansion represents an important step in strengthening RSK Group's approach to preventing and addressing modern slavery and human trafficking across our international supply chain, by embedding consistent expectations for ethical recruitment, fair working conditions and worker protections, and supporting improved due diligence, transparency and risk management as RSK Group continues to grow globally.

We expect our suppliers to maintain effective and accessible grievance and whistleblowing mechanisms that enable workers and other stakeholders to raise concerns safely, confidentially and without fear of retaliation. In turn, we are committed to promoting a culture in which concerns can be reported in good faith and to taking steps so that no individual suffers any detrimental treatment, discrimination or reprisal as a result of speaking up.

RSK Group has continued its rapid growth strategy during FY26, both organically and through the acquisition of complementing businesses. As part of the new business integration process, we are continually reviewing and aligning our procurement processes across RSK Group to ensure that they are fit for purpose in our growing organisation and developed in line with current good/best practice to manage any risks of slavery and human trafficking in our supply chains.

In response to evolving supplier due diligence requirements that increasingly encompass ethical and sustainability considerations, responsibility for supplier evaluations has been transferred from the Safety, Health, Environment and Quality (SHEQ) team to the Group Procurement team. This change is intended to strengthen oversight of due diligence processes and enhance the management of supply chain risk going forward.

Our Group standard purchasing terms make specific reference to the modern slavery and human trafficking legislation, making suppliers contractually obligated to comply with our policies and procedures, together with informing us as soon as they become aware of any instance of modern slavery or human trafficking taking place in their business or supply chain. In FY26, we strengthened our standard terms and conditions to reinforce compliance with applicable human rights laws, sanctions requirements and UK protections relating to harassment (including the preventative duty to take reasonable steps to prevent sexual



harassment), and to require suppliers and contractors to comply with relevant policies and procedures as outlined in this statement.

Following a review of our 17,000+ suppliers in FY25 which assessed them on inherent environmental and human rights risks, in FY26 we initiated a labour agency due diligence project. We engaged with five selected UK labour providers, developing a robust due diligence questionnaire, a worker voice survey and corrective action plans. The outcomes of the pilot will inform broader implementation of improvements to procurement processes and expectations of labour provision due diligence at Group and business unit level during FY27. The pilot revealed various challenges to identify risk in our supply chains, which we are currently addressing with improvements to our data for better visibility through tier-1 (direct suppliers) and beyond in the supply chain to overcome the challenge to gathering a full and totally accurate supply chain picture. These are issues we are continually looking to address and improve on. During the labour provider due diligence programme, feedback received through a worker voice survey was reviewed and investigated in line with our responsible business and modern slavery procedures. Following this process, no evidence of modern slavery was identified.

MEASURING EFFECTIVENESS

In FY26, we did not identify nor receive disclosures of instances of slavery, forced labour or human trafficking in our organisation or supply chain.

We will continue to review, monitor and assess how effective our processes are in identifying and managing risks with the aim of preventing slavery and human trafficking from occurring within our organisation and supply chains. We will take appropriate action in response to the findings of those reviews and assessments in order to support continual improvement. This includes reviewing the design and operation of our controls, such as supplier onboarding and evaluation checks, contractual requirements, training completion and the use of reporting channels, as well as tracking risk-based activity, including the number of suppliers prioritised for further due diligence, engagement with higher-risk suppliers, and remediation actions where issues are identified. Findings are used to inform updates to our policies, training and supplier engagement approach.

Since last year, we have further developed RSK Group's internal online compliance portal, including the introduction of a dashboard to improve usability and access to data. The portal has initially been rolled out to a limited number of businesses and will be expanded further in FY27. This phased rollout will support the portal's use as a central risk assessment tool for identifying actual and potential human rights and modern slavery risk areas, recording mitigation measures and capturing lessons learned.

During 2025, one of our businesses with RSK Environment Limited was audited by a customer on our modern slavery programme, and this has further informed key areas of improvement aligned with the findings of our gap assessment. It also showed we had effective governance, policies, training and HR systems to prevent the risk of modern slavery. The modern slavery audit and our own human rights gap assessment identified improvements necessary to support alignment of our raising concerns mechanism meets the UNGP criteria, specifically on accessibility by providing multiple reporting channels and languages are provided. To contribute to this, we have used key resources like our 2025 Anti-Slavery Week awareness raising campaign and updates to our modern slavery e-Learning module to promote awareness of the mechanism and we will continue working to improve its accessibility and visibility.



In FY26, one of the actions we took was to create human rights related KPIs for select business units across the RSK. This was done following a human rights action plan created based on findings of FY25's human rights risk and gap assessment. These KPIs represent a major step forward in strengthening human rights governance, risk management, and awareness across the Group, and will be rolled out in FY27.

TRAINING AND AWARENESS

In FY26, one of the actions identified was to create human rights training for RSK Group. As RSK already had mandatory e-learning on modern slavery, we decided to build upon this existing content, extending learning to cover:

- What human rights are, why they are important, how modern slavery violates these rights, and what the potential signs of modern slavery are.
- RSK Group's policy commitment around human rights and modern slavery and how that commitment links directly to employees' every-day work.
- What RSK Group employees can do to protect human rights and report suspicious activity, especially through our Raising Concerns mechanism.

Improvements were focused on helping employees understand how human rights relate to their day-to-day work, enabling them to respect and promote human rights as they carry out their roles. Employees must complete this training as part of induction and refresh it as part of their ongoing training programme. Our training is available to all and accessible in multiple languages and formats. Employees are assessed on their understanding through questions embedded throughout the course, which must be completed successfully in order to pass.

In FY26 Group Procurement have used SCSS for more in depth sustainable procurement training, including in depth modules on Modern Slavery and used the school to provide Modern Slavery awareness training to key suppliers. This training will continue through FY27. RSK Group continues to be a member of the SCSS Modern Slavery Leadership Group, Built Environment Against Slavery, which provides opportunities to align our approach to combatting modern slavery and labour exploitation through the upskilling of our own workforce and our wider supply chain. RSK Group is proud to be part of a group which is the largest anti-slavery collaboration in the UK built environment.

In collaboration with the SCSS and Align Ltd, Octavius delivered a series of three lived experience workshops in FY26, designed to deepen understanding of modern slavery through first-hand insight. A total of 40 participants attended the sessions, which were tailored to key audiences including HR and Talent, Procurement, and operational colleagues. These sessions provided the opportunity to hear directly from individuals with lived experience of exploitation, helping to humanise the issue, challenge assumptions, and strengthen awareness of how modern slavery can manifest in practice. Octavius are looking to build on this in FY27, exploring opportunities to hold a webinar and extend invitations to their supply chain.

In FY26, we continued to run our global awareness campaign during Anti-Slavery Week, with more than double the engagement compared to the previous year. The campaign included webinars, toolbox talks, quizzes and charity events, alongside awareness materials and communications to reinforce how to spot the signs, identify red flags in business relationships (including suppliers) and report concerns. Of note were our efforts to raise awareness of modern slavery risks among site-based staff who were identified as at-risk stakeholders in our business. To do this, we developed toolbox talks, provided training on how to



deliver them, and tracked toolbox talk delivery across RSK sites. Over 1,200 staff were trained via these talks in the UK and internationally. In addition, we took our poster on spotting the signs of modern slavery and how to report concerns, translated into 16 additional languages, alongside English, to increase accessibility and reach.

Anti-Slavery Week 2025 also saw RSK Group strengthen its approach to supplier engagement through coordinated RSK Group-wide communications. For the first time, we delivered a targeted supplier campaign aligned to Anti-Slavery Week, reinforcing expectations on ethical conduct and modern slavery awareness throughout the supply chain.

NEXT STEPS

In the next financial year, we will continue to strengthen our approach to preventing and addressing modern slavery and human trafficking, and to support continuous improvement across our organisation and supply chains. Our priority actions for FY27 include:

1. continuing to implement and embed the actions identified through our Group-wide human rights risk and gap assessment, including improvements to due diligence processes, modern slavery risk management and wider human rights governance;
2. continuing rollout of our human rights KPIs for businesses, and provide support internally to implement and achieve them;
3. further developing and using the Group's internal online compliance portal covering Human Rights and Modern Slavery, to improve visibility of actual and potential risk areas, available mitigation measures and lessons learned;
4. continuing to utilise our partnership with Achilles to support the collection and maintenance of supplier data relevant to modern slavery and human rights risks
5. embedding the updated Human Rights and Modern Slavery training across the Group, including multilingual versions, and continuing to utilise training available through the Supply Chain Sustainability School, including sustainable procurement training where modern slavery and human rights risks form part of annual ESG planning;
6. supporting the Anti-Slavery Working Group to attend an in-person event during FY27 to further strengthen capability, share learning and support the continued development of the Group's approach; and
7. reviewing and improving the Raising Concerns mechanism in FY27 by assessing it against the effectiveness criteria in the United Nations Guiding Principles on Business and Human Rights, introducing additional reporting routes where needed, increasing awareness of how to raise concerns, and improving access through multilingual materials for employees, suppliers, third parties and stakeholders.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 in England & Wales and the reporting obligations under sections 13 and 16 of the Modern Slavery Act 2018 (Cth) in Australia, and constitutes RSK Group's modern slavery and human trafficking statement for the financial year ending 31 March 2026.

This statement has been approved by the Board of Directors of RSK Group Limited (the principle governing body) and signed by a Director on behalf of RSK Group Limited. Where required, relevant subsidiary



leadership have contributed to, reviewed and confirmed the content as part of the consultation process described above, to support applicable reporting requirements in the UK and Australia.

Alan Ryder

Dr Alasdair Alan Ryder

Chief Executive Officer

RSK Group Limited

Date: 1st July 2026

This statement has been approved by the Board of Directors of each the following Group subsidiaries, being the companies in the Group that are obliged to publish a modern slavery statement and signed by the Managing Director on behalf of the relevant company. Relevant leadership have contributed to, reviewed and confirmed the content as part of the consultation process described above, to support applicable reporting requirements in the UK and Australia.

Alan Ryder

RSK Environment Limited

Director's Name: Alasdair Alan Ryder.

Signed by:
Scott Aitken

Binnies UK Limited

Director's Name: Scott Aitken

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Atlantic (Aust) Pty Ltd Trading as Adenco

Director’s Name: Christoff Van Der Schyff