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Modern Slavery Policy

Enable Investment Holdings is a consortium of award-winning SME businesses operating in the UK transport sector. It allows us to provide complete in-house solutions including design and survey (ENABLE Design), tools and plant (Enable Hire), resourcing (Enable Resourcing), and civil and electrification construction (Enable Infrastructure Limited).

Our group has an annual turnover of approximately £44 million and around 120 employees across our UK sites.

Our in-house capabilities, scale, and supply chain partnerships allow us to deliver complex, multi-disciplinary projects. We take a dynamic, flexible approach to projects on a turnkey, consultancy, main contract, subcontract or resource supply basis to meet client needs time-efficiently and cost-effectively.

The Policy

Enable does not tolerate modern slavery in any of our businesses or in our supply chains and we recognise that high levels of integrity are required in our procurement of people, goods and services. We have introduced a zero-tolerance approach to modern slavery and have examined our working practices to identify risks and implement effective controls, systems and procedures to prevent and reduce risks accordingly.

We are also committed to ensuring that there is transparency in all our business operations and expect the same approach to be taken by all our suppliers, subcontractors and other business partners. Our Supplier Code of Conduct details how we expect our subcontractors and suppliers to operate, our business partners sign up to this code of conduct which makes reference to specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own suppliers to the same high standards.

Scope of the Policy

This policy applies to all persons working for Enable Infrastructure Limited, Enable Design, Enable Resourcing, or Enable Hire or on their behalf, in any capacity, including employees at all levels; directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, subcontractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and may be amended at any time.

Responsibility for the Policy

The board of Enable has overall responsibility for ensuring that this policy complies with the organisation's legal and ethical obligations, and that all those under its control comply with it.

The Chief Operating Officer has primary accountability for implementing the policy, monitoring its use and effectiveness, dealing with any queries regarding the policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on the policy and the issue of modern slavery in supply chains.

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Although the Chief Operating Officer will be the individual lead on this policy, day-to-day responsibility will be delegated as follows:

- General Manager (Resourcing) – labour supply
- Senior Buyer – supply chain and procurement
- General Manager – plant and welfare (Enable Hire)
- Compliance Manager - documented procedures and processes

Comment on this policy is encouraged and suggestions on ways in which it might be improved should be addressed to the Chief Operating Officer.

Compliance with the Policy

All employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of the organisation or its supply chains are the responsibility of all those working for, or under, Enable Infrastructure Limited, Enable Design, Enable Resourcing and Enable Hire control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

All employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part or at any level of the organisation or its supply chains at the earliest possible stage. If an employee is unsure about whether a particular act, the treatment of workers more generally, or the working conditions within any tier of our supply chains, constitutes any of the various forms of modern slavery, this must be raised with the respective line manager or the Chief Operating Officer.


If it is thought or suspected that a conflict with this policy has occurred, or may occur in the future, employees must initially notify their functional manager, as soon as possible. This can also be done in accordance with the organisation’s Whistleblowing Policy, which is available on the company’s integrated management system hosted on SharePoint. The person receiving the initial report will take whatever immediate action that may be deemed necessary, and all cases will be brought to the attention of the Chief Operating Officer as a matter of urgency. Once the Chief Operating Officer has been informed of a suspected breach of policy, he/she will assume responsibility for any further actions taken. All actions should be documented and timed and all documentation, or other evidence relating to a suspected breach of policy, will be collected and retained by the Chief Operating Officer should further disclosure in criminal or civil proceedings be required.

Enable encourages openness and will support in good faith anyone who raises genuine concerns under this policy, even if they turn out to be mistaken. We are committed to ensuring that no-one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is, or may be taking place, in any part of our business or in any of our supply chains. Detrimental treatment may include dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes that they have suffered any such treatment, they must inform the Chief Operating Officer or People and Performance team immediately. If the matter is not remedied, and they are an employee, it must be raised formally using the grievance policy which is available on the company integrated management system hosted on SharePoint.

Communication, Awareness and Development of the Policy

Training on this policy, and on the risks that Enable faces from modern slavery in its supply chains, will be provided as necessary. Modern Slavery Online Awareness Training forms part of the induction process and is mandatory. In addition, on-site supervisors and some national/regional/head office roles, will be required to complete training on modern slavery.

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Key directors and managers of the company have received in-depth training to understand what modern slavery is and how it can affect the business. These managers have conducted a thorough risk assessment process and have identified the key risks to the company. Appropriate risk mitigation steps have been identified and will be implemented to reduce the risks wherever possible.

A comprehensive modern slavery action plan has been formulated and will be implemented, this will be driven by a number of key performance indicators (KPIs). Progress against the action plan and the KPIs will be reported to the board of Enable by the Chief Operating Officer on a quarterly basis.

Enable acknowledges that the risk of modern slavery is present in the construction sector in the UK, particularly when temporary workers recruited via third party recruitment agencies are involved. This sector represents approximately 80% of all hours worked. To manage this part of our supply chain, we have established Service Level Agreements with a number of national and local recruitment agencies in the UK.

We believe the three key areas where risks exist and can be mitigated are: payroll, recruitment of temporary manual workers, and procurement of raw materials. We will take the following action to prevent or minimise the risk of modern slavery in these areas:

Payroll:

- Enable will only pay into a bank account supplied by employees.
- No cash or ad hoc payments are, or will be, made to alternative accounts.
- Enable pays labour suppliers on invoiced amounts, the supplier in turn pays individual subcontractor.

Recruitment:

- Job adverts are posted externally and on our website. Interviews are conducted face-to-face or via video links, offers are made electronically via email and copies of references received and checked, along with right to work and identity documents. Copies are kept on record along with qualifications and appropriate certificates.
- Recruitment of contract/agency workers is handled by line managers on projects, depending on the role.
- Our relationship with key labour suppliers is close and longstanding and gives us insight into their practices. We are confident that they put our strong commitment regarding modern slavery at the forefront of their business models.
- Professional competences are checked as a matter of course using the rail Sentinel system or equivalent. Prospective recruits must have the right qualifications, drug & alcohol medicals, and other qualifications to be able to work on our projects. Checks are initially done by the recruitment agency and are also checked by the relevant Enable business. For certain roles, tests are administered before prospective recruits are allowed on site.

Procurement:

- The vast majority of materials procured are pre-cast concrete and aggregates. These are sourced from UK-based builders' merchants with whom we have longstanding business relationships.
- We buy large plant, small plant and tools from large UK-based businesses.
- Our materials are bought to the specification requested by the specific project, generally in line with the designer or client requirements. Timber is required to be FSC (Forest Stewardship Council) or PEFC (Programme for the Endorsement of Forest Certification) certified.
- Steel is bought from UK manufacturers who are on our approved vendor list.

Enable Holding's zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as

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appropriate thereafter. Potential business partners will be required to demonstrate they can, and will comply with this policy, and may be required to produce evidence to this effect. Our supplier code of conduct sets out our expectations in relation to compliance with this policy and a pre-qualifying questionnaire will screen all potential future suppliers to test compliance.

All our existing company policies will be reviewed by the appropriate document owner to check for compliance with the Modern Slavery Act and amended accordingly. Each amendment will be notified to the Managing Director for approval.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

If a supplier or subcontractor is found, or suspected, to be in breach of this policy, they will be required to conduct an urgent review and report their findings to Enable. Any breaches could result in contract termination or a requirement to put in place steps to prevent future breaches. Any criminal offences that come to the attention of Enable will be referred to the appropriate authorities, with the consent of the victim if appropriate.

Other Sources of Information:

- Enable Whistleblowing Policy
- Enable Grievance Policy

This Policy has been approved by the board of Enable and will be reviewed on an annual basis.

Stuart Jackson
Chief Operating Officer
 October 2024

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