

# HRP019P - Modern Slavery and Human Trafficking Statement

April 2025

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The Modern Slavery Act 2015 requires any commercial organisation carrying out business in the UK with a total annual turnover of £36,000,000 or more to produce a statement setting out the steps taken to ensure that modern slavery and human trafficking are not occurring within the organisation or its supply chain.

Story Contracting Ltd is a member of the Story Contracting Holdings Limited group of companies. Story Contracting Ltd is a privately owned, award-winning infrastructure company operating across the UK and delivering rail, construction, and specialised plant solutions.

We operate through a combination of directly employed colleagues, specialist subcontractors, hired-in plant, agency labour, and a nationally dispersed materials supply chain. Our supply chains include (but are not limited to) civil engineering materials, labour-only subcontractors, specialist consultants, environmental services, logistics providers, and OEM plant suppliers.

We aim to create a place where everyone feels comfortable regardless of race, gender, disability or sexual orientation. We do this by eliminating discrimination and encouraging diversity among our workforces. All colleagues are treated fairly and with respect and selection for employment, promotion, training and other benefits are always on the basis of ability and attitude.

We fully support the principles and requirements of the Modern Slavery Act 2015 and are committed to maintaining compliance across both our workforce and the supply chain. We recognise that, as a contractor operating within rail and construction — sectors with multi-tiered labour models — vigilance and proactive controls are essential.

As part of the rail and construction industries, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously. We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking. This statement relates to actions and activities during the financial year 1 April 2025 to 31 March 2026.

## Directly Employed Colleagues

We are committed to providing opportunities for employment and recruitment from within the communities in which we operate. We value our people and have high expectations of them. In return we aim to provide them with a safe, supportive and rewarding environment in which to develop and reach their full potential.

We are proud to pay a minimum of the current Living Wage rate to our colleagues. Training on Modern Slavery and Human Trafficking is provided to all new starters through induction and ongoing learning modules. This training supports colleagues in recognising the signs of modern slavery, knowing how to escalate concerns and understanding their responsibilities under the Modern Slavery Act. Any colleague who have concerns about modern slavery/human trafficking are encouraged to raise their concerns under our Whistleblowing Policy (HRP015).

We have controls in place to reduce the risk of modern slavery within our workforce

- Verification of right-to-work documentation for all colleagues prior to appointment.
- Regular audits of right-to-work expiry dates and follow-up processes via People Team workflows.
- Bank account checks to identify red flags such as multiple colleagues paid into single accounts or third-party accounts.

Issues raised are investigated promptly via our Whistleblowing Policy, with confidential reporting routes available to colleagues and contractors.

## Supply Chain

Our supply chains include purchasing materials, sub-contracting, consultants, environmental and other associated trades and services connected with our industry.

The obligations imposed by the Modern Slavery Act are clearly articulated in our agreements with subcontractors and suppliers and compliance is required.

We have established processes to identify and mitigate the risk of modern slavery and human trafficking within our supply chain. These include:

- Pre-qualification checks via our procurement and assurance processes, requiring suppliers to demonstrate compliance with the Modern Slavery Act, right-to-work controls, and ethical labour standards.
- Collection of supplier Modern Slavery Statements (where required by law) and mandatory declaration of labour-related controls.
- Ongoing review of supplier status, including removal from approved lists where concerns arise.

We recognise that certain parts of our operations and supply chain present elevated risks of modern slavery and human trafficking. These include:

- Labour-intensive construction and rail activities, where large numbers of subcontracted workers are engaged.
- Agency-supplied labour, particularly in short-notice or high-volume recruitment situations.
- Lower-tier subcontracting arrangements, where visibility and assurance may be reduced.

- Procurement of materials and components sourced through complex or international supply chains, including items such as PPE, small tools, and plant spares.

We mitigate these risks through the due diligence and control measures outlined in this statement, including right-to-work checks, supplier vetting, contractual requirements, worker verification processes, and confidential whistleblowing routes

## Our Policies

The policies which underpin this statement include our Modern Slavery & Human Trafficking Policy, Colleague Relations Policy, Whistleblowing Policy, Safeguarding Policy, and associated People policies. These policies set clear expectations for ethical conduct, outline reporting routes for concerns, and support our commitment to ensuring there is no modern slavery or human trafficking within our organisation or our supply chain

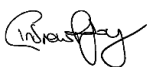
## Effectiveness and Key Performance Indicators (KPIs)

To ensure our controls are effective in preventing modern slavery and human trafficking, we monitor a range of performance indicators across our workforce and supply chain. These include:

- Right to work audit completion rates and the number of corrective actions required.
- Supplier due diligence checks completed, including reviews of supplier Modern Slavery Statements and ethical compliance declarations.
- Bank account anomaly checks completed and cases resolved.
- Training uptake, including completion rates for induction modules and targeted training for relevant staff groups.
- Number of concerns raised through whistleblowing or escalation routes and actions taken to address them.

Findings from these indicators are reviewed annually by our People Team, Procurement and HSQE functions, and inform continuous improvement of our modern slavery controls.

This statement will be reviewed annually.



**Andy Joy**

Chief Executive Officer  
Story Contracting Limited