

**FC CIVILS SOLUTIONS LIMITED  
(TRADING AS FERROVIAL CONSTRUCTION)**

**MODERN SLAVERY STATEMENT  
FINANCIAL YEAR 1 JANUARY TO 31 DECEMBER 2023**

**INTRODUCTION**

It continues to be a priority for Ferrovia Construction to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. We are committed to taking all appropriate steps, as far as we are able, to ensure that there is no slavery or human trafficking in our business or in our supply chains. We are proud of the steps already taken and continually seek to improve our practices to combat slavery and human trafficking.

**THE ORGANISATION'S STRUCTURE**

Ferrovia Construction is a company registered in England and Wales and operates throughout the UK. We are part of the construction division of the Ferrovia group of companies that is ultimately owned by Ferrovia SE, one of the world's leading infrastructure operators and municipal services companies.

**FERROVIAL'S COMMITMENT TO COMBATTING SLAVERY AND HUMAN TRAFFICKING**

Ferrovia has a good track record of demonstrating a high commitment to sustainability issues, including combatting slavery and human trafficking.

Last year Ferrovia entered into the Dow Jones Sustainability Index for the 22<sup>nd</sup> year running.

Ferrovia also participates in a number of international initiatives such as the Tripartite Declaration (International Labour Organisation), OECD Guidelines, United Nations Universal Declaration of Human Rights and the United Nations Global Compact. Having originally signed the UN Global Compact in 2002, Ferrovia ratifies its commitment to those principles every year.

The following Ferrovia policies (which are accessible on the Ferrovia website at <https://www.ferrovial.com/en-gb/sustainability/governance/>) demonstrate our commitment to combatting slavery and human trafficking:

- Code of Ethics
- Corporate Responsibility Policy
- Human Rights Policy
- Supply Chain Policy
- Suppliers Code of Ethics
- Third Party Ethical Integrity Due Diligence Procedure

The above policies apply to all Ferrovia group companies. In addition, Ferrovia Construction has its own Sustainability Statement.

**SUPPLY CHAIN AND DUE DILIGENCE**

Ferrovia Construction has an extensive and varied supply chain and engages with various entities, including large corporations, SMEs and consultancies.

To ensure all those in the supply chain acknowledge and comply with Ferrovia's commitment to sustainability and responsible business practice (including combatting slavery and human trafficking),

we include in our supply chain contracts provisions to oblige suppliers and subcontractors to comply with Ferrovia's Code of Ethics ("Ethics Code") which is available for review at <https://www.ferrovial.com/en-gb/sustainability/ethics/corporate-code-of-ethics/>.

We regularly review our due diligence processes to ensure that appropriate checks are carried out on their suppliers and subcontractors prior to their appointment, to assess their commitment to combatting slavery and human trafficking, and to monitor their performance in this area.

We understand that the following areas give rise to the highest modern slavery risks:

- **Within the UK** – labour supply; and
- **Outside the UK** – electronics, hi-tech, solar panels (and components), shipping, garment and textile manufacture, mining and forestry (particularly in the following countries: North Korea, Eritrea, Mauritania, Saudi Arabia, Turkey, UAE, Russia, Afghanistan, Kuwait, India, China, Malaysia, Myanmar, Vietnam, Pakistan, Indonesia, Nigeria, Ukraine, North Macedonia, Argentina, Bangladesh, Turkmenistan and Albania).

As part of our initiative to identify and mitigate risk we have a Third Party Ethical Integrity Due Diligence Procedure and in all investment operations special attention is given to human rights, good governance and social aspects. We also use the Build UK Common Assessment Standard to pre-qualify our supply chain, and ask all suppliers to sign up to Ferrovia's Suppliers Code of Ethics.

We also have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

**TRAINING**

All new employees have the benefit of a detailed induction process which includes making employees aware of their own rights and benefits, and the content of Ferrovia policies.

A great emphasis is placed on setting ideal behavioural attitudes in new and existing employees. All new and existing employees must attend and participate in a training programme which emphasises a zero tolerance attitude to situations that are against Ferrovia values and policies. All employees are made aware that a confidential hot line number is available to report any incidents or concerns and are encouraged to use it to report any concerns.

This statement is made pursuant to Section 54(6) of the Modern Slavery Act for the financial year ending 31 December 2023. It was approved by the Board on 29 May 2024.

Signed

*K Goose*  
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**Karl Goose**  
Managing Director  
FC Civils Solutions Limited  
Date: