

1 INTRODUCTION

Consistent with our commitment to operate ethically and in compliance with all relevant laws and regulations, we recognise our responsibility to manage and prevent the risks of Modern Slavery and Human Trafficking within our operations and supply chain.

This statement describes the positive steps we have taken, will take, and are continuing to take, to ensure that Modern Slavery and Human Trafficking does not take place within our supply chain or any part of our business.

We have prepared this statement with reference to the Transparency in Supply Chains (TISC) Statutory Guidance issued by the Home Office on 27 March 2025.

2 ORGANISATION, BUSINESS AND SUPPLY CHAIN

ORGANISATION STRUCTURE

Darwin Group Limited ("Darwin") is a UK-based specialist design, manufacture and construction business focused on the delivery of high-quality offsite and modern methods of construction (MMC) solutions for public and private sector clients.

Darwin operates as part of the wider Portakabin Limited group of companies and is headquartered in the United Kingdom. The business employs a multidisciplinary team of professionals including designers, engineers, project managers, commercial specialists, manufacturing personnel and site-based delivery teams. Darwin delivers projects throughout the United Kingdom and has established governance, compliance and risk management processes that are aligned with the standards and expectations of the wider group whilst maintaining operational responsibility for its own activities and supply chains.

OUR BUSINESS

Darwin specialises in the design, manufacture, construction, refurbishment and fit-out of permanent modular buildings and healthcare facilities. Through the integration of design, manufacturing and construction expertise, Darwin provides complete project solutions across a range of sectors including healthcare, education, commercial, custodial, defence and public sector infrastructure.

The business combines advanced manufacturing techniques with traditional construction delivery methods to provide high-quality, efficient and sustainable building solutions. Darwin is committed to conducting all aspects of its business ethically, responsibly and in full compliance with applicable laws and regulations, including those relating to modern slavery and human trafficking.

OUR SUPPLY CHAIN

Darwin's supply chain supports the manufacture, installation and construction activities undertaken by the business. It comprises suppliers, subcontractors, consultants, logistics providers, manufacturers and service providers operating predominantly within the United Kingdom, with selected materials and components sourced through established supply partners.

Darwin recognises that modern slavery and human trafficking risks can exist within construction and manufacturing supply chains. Consequently, the business is committed to implementing proportionate controls to identify, assess and mitigate these risks. These controls include supplier due diligence, procurement controls, supplier onboarding procedures, contractual requirements, risk-based supplier assessments and ongoing monitoring activities.

Darwin expects all suppliers, subcontractors and business partners to operate in accordance with applicable legislation relating to modern slavery, ethical employment and human rights and to maintain appropriate standards throughout their own supply chains.

OUR PEOPLE

We have reviewed our employment practices across the business, and we have not identified any working practices which would raise concerns that our employees are:

- forced to work through mental or physical threat;
- owned or controlled through mental or physical abuse or threat of abuse;
- de-humanised, treated as a commodity or bought and sold as property; or
- physically constrained or whose freedom of movement is restricted (e.g., through the retention of passports).

GOVERNANCE AND AUDIT

We have a clear governance process for dealing with any Modern Slavery and Human Trafficking challenges in our operations and supply chains.

Assessing and implementing our controls and actions in respect of Modern Slavery and Human Trafficking is undertaken by our Legal and Governance function working in conjunction with procurement, HR, project delivery teams across the business and our Internal Risk team.

3 OUR POLICIES AND CONTROLS

In addition to this statement, we have a Modern Slavery and Human Trafficking policy which outlines our stance and commitment to ensuring that there is no Modern Slavery or Human Trafficking in our supply chains or in any part of our business.

Our Employee Code of Conduct (and the ethical compliance policies referenced within it) summarises the principles we rely on to carry out our day-to-day activities and our Supplier Code of Conduct sets out the ethical requirements of our suppliers, including in respect of Modern Slavery and Human Trafficking.

Our Supplier Code of Conduct (which all suppliers are required to sign up to as part of onboarding) specifically requires our suppliers to comply with our policies and respect workers' fundamental rights, ensuring that their workers are:

- free to form or join a workers' council;
- paid in compliance with local laws;
- not required to work more than the maximum hours of daily labour; and
- not subject to any form of forced, involuntary or debt bonded labour.

OTHER CONTROLS

- Members of the board of directors of Portakabin and other members of senior management make regular visits to our operational sites.
- We conduct regular employee surveys which include seeking employee views on welfare matters.
- We have grievance and speaking-up procedures, including a confidential, independent speaking-up hotline available to all employees. Several of our company policies have been updated to include a QR code which links to our speaking-up procedures. We did not receive any reports in 2025 which would raise concern of Modern Slavery or Human Trafficking in our business.
- Our HR teams are alert to flags which could signal risks relating to modern slavery and understand how they should report any issues.

ACTIONS TAKEN IN 2025

- Completed and adopted the Ethical Compliance Framework, following Board approval. The

Ethical Compliance Framework, which includes a detailed section on Modern Slavery and Human Trafficking details our approach to ethical compliance through six guiding principles: (1) Top Level Commitment; (2) Risk Assessment (including country-level risk, sector-level risk); (3) Proportionate Procedures and Controls; (4) Due Diligence; (5) Communication (including Training); and (6) Monitoring and Review.

- Continued to ensure that all key non-UK suppliers sign the Supplier Code of Conduct, maintaining a record of all suppliers who have signed.
- Reviewed and commenced the update of the Modern Slavery and Human Trafficking policy.
- Reviewed and updated the Modern Slavery and Human Trafficking section of the Code of Conduct.
- Reviewed and updated the ethical compliance undertakings in standard UK supplier purchase order terms and conditions and standard Consultancy Agreement (which includes undertaking in respect of Modern Slavery and Human Trafficking).

ACTIONS PROPOSED IN 2026:

- Complete an update of the Modern Slavery and Human Trafficking Policy.
- Employee Code of Conduct update (to include an update of the section on Modern Slavery and Human Trafficking).
- Supplier Code of Conduct update (to include an update of the section on Modern Slavery and Human Trafficking).
- Procurement Policy update to include key elements that help ensure that Modern Slavery and Human Trafficking does not take place in our supply chain (e.g. aggressive pricing that does not consider sustainable production costs, short lead times, late high-volume orders, inaccurate forecasting, late or extended payment terms, withdrawing from contracts last minute, unfair penalties for not meeting orders despite last minute changes, inaccurate technical specifications)

4 ASSESSING, MANAGING AND MITIGATING RISK

Set out below is a summary of the actions we take to assess, manage and mitigate the risk of Modern Slavery or Human Trafficking within supply chains.

As referred to above, a company risk assessment of Modern Slavery and Human Trafficking forms part of our Ethical Compliance Framework. The geographies we operate in are at a relatively low risk for modern slavery both globally and geographically due to both the estimated overall prevalence of modern slavery as well as the vulnerability of the populations to modern slavery. However, certain suppliers to Portakabin will import goods from other geographies, which may have more vulnerable populations and a higher prevalence of modern slavery. Timber is highlighted as one of the UK's imported goods most at-risk of modern slavery and is one of our key commodities. The majority of timber purchased by Portakabin is either FSC or PEFC certified. Both certifications require suppliers to comply with the ILO Declaration on Fundamental Principles and Rights at Work (1998) which expressly prohibits the use of forced and underage labour.

The Legal and Governance and Procurement functions annually complete the Modern Slavery Assessment Tool (MSAT) as further detailed below to assess risk and identify improvement actions.

ACTIONS TAKEN IN 2025:

- Reviewed the answers to audits of project sites confirming that the appropriate materials are displayed and that there is no evidence of Modern Slavery or Human Trafficking.
- Reviewed and updated the MSAT questionnaire to record improvements made and actions that have been taken following the assessment.

ACTIONS PROPOSED IN 2026

- Implement the Ethical Compliance Risk Assessment Questionnaire that includes an assessment risk and effectiveness of controls across the business with respect to modern slavery.
- Review and update the MSAT questionnaire to record improvements made and actions that have been taken following the assessment.

- Supplier Risk Management: the Supply Chain and Procurement Teams are re-designing the approach to Supplier Risk Management to create a more complete and robust assessment and reporting process

5 DUE DILIGENCE

The selection and onboarding of suppliers is undertaken centrally or at local level as appropriate. Before any Portakabin supplier is appointed, a comprehensive review is undertaken of their commercial, financial and reputational standing. We also ask suppliers to adhere to our Supplier Code of Conduct as part of the onboarding process.

ACTIONS TAKEN IN 2025:

- Implemented due diligence/risk assessment platform with key suppliers; the platform includes an assessment of labour conditions and modern slavery risk.
- Improved supplier onboarding to include more detailed questions concerning modern slavery compliance.

ACTIONS PROPOSED IN 2026:

- Continue onboarding new suppliers through our revised onboarding process.
- Continue to ensure that all key non-UK suppliers sign the Supplier Code of Conduct, maintaining a record of all suppliers who have signed.
- Increase the number of key suppliers that are risk assessed through the new due diligence/risk assessment platform

6 TRAINING AND AWARENESS

We have sought to ensure that training and awareness on ethical principles remains at the heart of both our employee “onboarding” experience and ongoing, day-to-day learning and development activities.

All new colleagues are required to read and sign our Employee Code of Conduct, which sets out the company’s zero-tolerance stance to Modern Slavery and Human Trafficking. In addition, it specifically refers to some practical “Dos and Don’ts” in relation to Modern Slavery (with a link to our Modern Slavery and Human Trafficking policy), which continues to be an integral element of new employee onboarding and is published on our Intranet for ease of reference for existing employees.

ACTIONS TAKEN IN 2025:

- As part of the work on the Ethical Compliance Framework last year, we reviewed communication points with the business in respect of modern slavery risk.
- Awareness poster and briefing note continues to be part of the HSE Site Operations Manual for every project site.
- Continued onboarding of new employees, including the requirement to read and sign our Employee Code of Conduct.

ACTIONS PROPOSED IN 2026:

- The update of the Employee Code of Conduct will be carried out with a view to enhance employee engagement, such as including “real-life” factual scenarios applicable to Portakabin to make the Do’s and Don’ts and red flags as relevant as possible to employees.
- Preparation for delivering e-learning modules as part of the Ethical Compliance Framework, with the same emphasis on employee engagement as that taken with the update of the Employee Code of Conduct.
- Continued regular engagement with the procurement team to review progress of modern slavery actions and requirements.
- Update Modern Slavery and Human Trafficking section of the employee intranet.

7 MONITORING AND REVIEW

Annually, Portakabin carries out the Government's MSAT. The MSAT is a modern slavery risk identification and management tool designed to help organisations work in partnership with suppliers to improve protections and reduce the risk of exploitation of workers in their supply chains.

The MSAT has assisted us in ascertaining where we could further improve our approach to ensure that Modern Slavery and Human Trafficking does not take place within our supply chain or any part of our business.

ACTIONS TAKEN IN 2025:

- MSAT, achieving a score of 94%.
- Awareness poster and briefing note continues to be part of the HSE Site Operations Manual for every project site.
- Controls Self-Assessment review (the assessment includes a question on modern slavery risk and controls effectiveness).
- Governance Committee to receive and assess assurances that appropriate actions are being taken in respect of combating Modern Slavery and Human Trafficking.
- KPI approval and monitoring.

ACTIONS PROPOSED IN 2026:

- MSAT completion.
- Governance Committee to continue to receive and assess assurances that appropriate actions are being taken in respect of combating Modern Slavery and Human Trafficking.
- KPI approval and monitoring.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Modern Slavery and Human Trafficking statement of Portakabin Limited and its group companies for the financial year ending 31 December 2025.

This statement was approved by the board of Portakabin on 4 March 2026.

Dan Ibbetson
Chief Executive Officer
Portakabin Limited