

# PORTAKABIN LIMITED MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FYE 2024



## 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

Portakabin Limited (Company Number: 00685303) ("Portakabin") is the parent company of a number of subsidiaries, including, but not limited to Portakabin (Site Accommodation) Limited and Darwin Group Limited.

Portakabin has its head office in the UK, with over 2,000 employees operating in ten countries, through its subsidiaries and branches (England, Wales, Scotland, Ireland, Northern Ireland, France, Belgium, Luxembourg, Netherlands and Germany). Further details about Portakabin can be found at [www.portakabin.com](http://www.portakabin.com).

### OUR BUSINESS

Portakabin is a market leader in the design, manufacture and installation of permanent and temporary modular and portable buildings, and a pioneer of advanced modular construction across many sectors, including education, retail and leisure, healthcare and construction. Portakabin has its international head office in York and operates its business from a network of hire centres and depots across Europe.

### OUR SUPPLY CHAIN

We have a substantial number of suppliers supporting our business operations, covering all aspects of manufacturing, site services, corporate services and subcontracted fit out and installation of our modular buildings. Portakabin operates a global sourcing strategy for components and raw materials, however most of our suppliers are based in the United Kingdom and Western Europe.

We clearly communicate the expectations and requirements Portakabin has in relation to Modern Slavery and Human Trafficking through the supply chain, as further explained below.

An action for 2025 will be to review our supply chain mapping, including lower tiers.

### 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 2024 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 2024

- A revised Purchase Order has been created containing a link to the new supplier terms and conditions, which reference compliance with the Modern Slavery Act. This contractually obliges our suppliers to ensure Modern Slavery and Human Trafficking is not occurring in their business or supply chain.
- A newly drafted Procurement Policy has been implemented and circulated to the business. This outlines the legal principles (such as ensuring compliance with relevant domestic and global legislation, including legislation within the European jurisdictions in which we operate) and social principles (such as ensuring that the working conditions of our employees and our suppliers' employees is of sufficient standard) that Portakabin must adhere to in order to create a sustainable, ethical supply chain.
- Continued to ensure that all key non-UK suppliers sign the Supplier Code of Conduct, maintaining a record of all suppliers who have signed.

- Continued to develop our Ethical Compliance Framework (an overarching explanation of our ethical compliance, anti-corruption and economic crime compliance programme).
- Increased the number of suppliers engaged on our standard terms and conditions of purchase and form of subcontract.
- Increased our co-operation and interaction with other companies in the private sector to understand the initiatives they are taking in tackling modern slavery and government departments and agencies, such as “Unseen” and the “Gangmasters and Labour Abuse Authority”.

#### **ACTIONS PROPOSED IN 2025:**

- Implement the Ethical Compliance Framework.
- Review and update the Modern Slavery policy.
- Review and update the Modern Slavery section of the Code of Conduct.
- Review and update ethical compliance undertakings in standard customer and supplier T&Cs and Consultancy Agreement.

#### **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.

Our Legal and Governance function has carried out a desktop assessment of the risk of modern slavery in our supply chain or any part of our business. The output of this risk assessment 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 or forced and underage labour.

Separately, we assess key suppliers in our supply chain (i.e. those most significant in terms of volumes, criticality and expenditure across design, manufacturing and delivery) according to:

- Supplier Modern Slavery Prevalence Score (Global Slavery Index);
- Modern Slavery Vulnerability score (Global Slavery Index);
- Modern Slavery Government Response score (Global Slavery Index); and
- Industry (“high risk” industries identified in the “Tracking Modern Slavery in Government Supply Chains Guide”).

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

#### **ACTIONS TAKEN IN 2024:**

- Monitor 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.
- Review and update the Modern Slavery Assessment Tool questionnaire to record improvements made and actions that have been taken following the assessment.

#### **ACTIONS PROPOSED IN 2025**

- Develop a form of social audit with HR and Sustainability teams.
- Implement the Ethical Compliance Risk Assessment Questionnaire that includes a modern slavery assessment of risk and effectiveness of controls across the business with respect to modern slavery.

- Review and update the Modern Slavery Assessment Tool (MSAT) questionnaire to record improvements made and actions that have been taken following the assessment.

## **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 2024:**

- Continued onboarding of new suppliers through our onboarding process.
- Continued to ensure that all key non-UK suppliers sign the Supplier Code of Conduct, maintaining a record of all suppliers who have signed.

### **ACTIONS PROPOSED IN 2025:**

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

## **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), 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 2024:**

- 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 2025:**

- Preparation for delivering e-learning modules as part of the Ethical Compliance Framework.
- Review communication points with the business in respect of modern slavery risk.
- Procurement team review of modern slavery actions and requirements.

## **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 2024:**

- MSAT, achieving a score of 88%.
- Awareness poster and briefing note continues to be part of the HSE Site Operations Manual for every project site.
- In addition, the Audit Committee received and assessed assurances that appropriate actions are

being taken in respect of combating Modern Slavery and Human Trafficking.

- Controls Self-Assessment review (the assessment includes a question on modern slavery risk and controls effectiveness).

**ACTIONS PROPOSED IN 2025:**

- 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.

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 2024.

This statement was approved by the board of Portakabin on 17 June 2025.

**Dan Ibbetson**  
**Chief Executive Officer**  
**Portakabin Limited**