

MODERN SLAVERY STATEMENT 2025/26

Modern slavery is a heinous crime and Coombes Forestry Ltd (COOMBES) operates a zero-tolerance commitment to slavery and human trafficking. Under the Modern Slavery Act 2015 (the “Act”), COOMBES is dedicated to ensuring that human trafficking, slavery, forced or compulsory labour and/or servitude does not take place at any point in our business or in our supply chains.

This is a responsibility shared by all those we work with, and so we regularly train our employees and suppliers and have policies and frameworks in place to enable individuals to take action.

Our Structure and Supply Chain

COOMBES has 95 employees, of which 51% are based either in one of our Hampshire offices or our office in Kent, and approximately 150 contingent workers, who are predominantly based across south-central England. These workers are made up of sub-contractors, agency workers and consultants, all of whom reside in England. COOMBES and its operations are entirely based in the UK.

Operating in the rail, forestry and civil engineering sectors, COOMBES bids to public, private and voluntary sector organisations for contracts for work through structured business development processes. We are also contracted directly by private landowners or businesses for forestry and vegetation works. Additionally, we hire out various heavy plant machinery, predominantly for use in the rail and forestry sectors.

To achieve its business objectives, COOMBES purchases or hires heavy plant machinery, vehicles, tools, materials, mechanical equipment, PPE (personal protective equipment), IT hardware and peripherals and office equipment. In doing so, COOMBES works with nearly 200 suppliers, all of which are based in the UK. COOMBES considers therefore, that there is a relatively low risk of modern slavery and/or human trafficking occurring within its supply chain.

Our Policies

We have a number of policies (detailed below) that provide the governance and the frameworks to support the identification and eradication of modern slavery and human trafficking within COOMBES’s operations. These inform employees, our supply chain and our clients of our approaches to tackling modern slavery and the role they also play in this.

- Anti-Slavery & Human Trafficking policy
- Whistleblowing policy
- Code of Conduct
- Anti-bribery & Corruption policy
- Procurement policies

These policies are accessible to clients and suppliers on our website, and our employees can also access them on our shared internal drive.

These policies are reviewed regularly, and at least annually.

Training and Awareness

Modern Slavery awareness training is delivered to new employees at induction and is bespoke to the industries in which we operate to support effective identification of potential signs of slavery. Training is tailored to the audience and the environments within which they work, with site managers being coached to support whistleblowers. Refresher training is delivered routinely.

As part of our Approved Supplier Process, recruitment agencies and providers of contingent labour are required to undergo Modern Slavery awareness training at induction.

Contingent workers are mandated to attend COOMBES's Supplier Liaison Days (held quarterly), at which we talk about the signs of Modern Slavery and how concerns can be raised.

On Anti-Slavery Day each year COOMBES holds an awareness campaign that highlights the potential signs of modern slavery and human trafficking. Communications extend to our employees and indirect workers which promote reporting and whistleblowing channels.

Following consultation with our delivery teams, we have designed Modern Slavery Toolbox Talks that are impactful and are rolling these out across our workforce.

Due Diligence

COOMBES recognises that due diligence processes and reporting are essential management tools that improve risk identification. We have tailored approaches for both our supply chain and our employees, which are detailed below.

Suppliers and Contractors

We undertake stringent due diligence processes to ensure we only use suppliers and contractors who share our commitment to ethical practices. By working to secure a transparent supply chain through operating due diligence, COOMBES seeks to prevent modern slavery from occurring in the course of our operations.

We undertake the following courses of due diligence:

- COOMBES has clear Supplier Application processes in place for supplier approval, which includes due diligence checks to assess the suitability of suppliers to provide goods and services against required standards.
- We require suppliers to commit to meeting the modern slavery and anti-human trafficking provisions set out in our Code of Conduct as part of their submission to COOMBES's Approved Supplier List. Our Code of Conduct also sets out how we expect suppliers and contracts to behave.
- All suppliers are required to confirm, as part of the Supplier Application process, that there is no evidence of any modern-slavery or human trafficking within their organisation, or that of their own supply chain.
- We undertake site inspections and conduct audits of our suppliers and their premises to check for any indications of modern slavery or human trafficking.
- We obtain Modern Slavery statements from suppliers where available.

- Vet suppliers so far as is possible of their own compliance with the requirements of the legislation, including whether they have been convicted of an offence under the Modern Slavery Act 2015.
- Our supply chain is routinely analysed and audited by our Quality & Compliance and Finance teams.
- Suppliers are removed from COOMBES's Approved Suppliers List after 12 months of inactivity. Suppliers are required to complete the registration process again to re-join.
- We promptly and thoroughly investigate any claims or indication that a supplier or contractor to COOMBES is engaging in slave labour or human trafficking or is otherwise not complying with our Code of Conduct.

Employees

We conduct all business in an ethical manner and are committed to being a transparent organisation. We do not consider there to be a high risk of slavery or human trafficking within COOMBES's workforce, as we undertake the following measures of due diligence:

- Robust, documented recruitment processes incorporating identity and 'right to work' document checks, proof of address, contracts of employment, payment of salaries into bank accounts under the respective employee's name and ensuring everyone employed is 18 years or above (or 16 or above if in an apprenticeship). Identity and right to work checks are conducted at interview stage, with only original documentation accepted.
- Our HR and payroll teams ensure that all COOMBES employees are in receipt of at least the national minimum wage.
- Our Employee Handbook has a range of procedures to support in preventing modern slavery from occurring in our workplace. Employees routinely undergo briefings on the Handbook, its policies and their application.
- We honour our responsibility to protect whistleblowers who highlight to us any risk of slavery or human trafficking at COOMBES. We have a Whistleblowing Policy in place affirming this commitment, which also details the procedure for reporting concerns.
- Our open and inclusive culture sets the parameters for how we expect people to interact with colleagues, partners and customers.
- Everyone at COOMBES is required to comply with legal requirements at all times.

Effectiveness

Details of audits are reviewed and discussed at periodic compliance meetings. Individual SMART action plans are revisited and ensure that steps are being taken within the specified deadlines.

Modern Slavery training has been rolled out to 100% of our employees within our Commercial, Procurement, Finance, Quality & Compliance, Health & Safety and HR teams.

Future Performance Indicators

In our business year 2025/26, COOMBES is investing further in its Finance and Commercial team, contributing to the skills, experience and expertise already held in this area. This will further enhance our ability and capacity to ensure internal and external processes and systems relating to suppliers, contractors and employees are being adhered to and identify areas for further improvement.

In 2025/26, we are rolling out company-wide refresher training to our line managers on our Employee Handbook, including a module specifically around Modern Slavery and their role in helping to identify risk and escalating potential/actual issues. We also have plans to design and deliver interactive surgeries to our supply chain/contractors on our Code of Conduct.

We will add Modern Slavery as a category to our Close Call reporting system, to support ease of reporting concerns.

In October 2025, COOMBES will once again observe Anti-Slavery Day across the business and its operations, and campaign to raise awareness amongst employees and sub-contractors of the dangers and consequences of modern slavery, human trafficking and exploitation.

COOMBES takes responsibility for this Statement and its related objectives, and to review and update it in accordance with the act.

Shane Coombes, Managing Director
March 2025