



Modern Slavery and Human Trafficking Statement 2025/2026

More than 250 years since the end of the transatlantic slave trade, there are nearly 50 million* people trapped in some form of slavery (forced marriage or forced labour) worldwide today (*International Labour Organisation 2022) and at least 100,000 in the UK. Modern slavery and human trafficking are heinous forms of organised crime in which people are treated as commodities and exploited for criminal gain.

This statement applies to Bazalgette Holdings Limited as well as its group companies and subsidiaries (the Group). The Group has zero tolerance to all forms of exploitation, whether it be enslavement, people trafficking, racial intolerance, gender or disability inequality. Our **Modern Slavery and Human Trafficking Statement** sets out the steps the Group is taking to ensure the Thames Tideway Tunnel Project and its supply chain adheres to all relevant legislation and that our employment practices are fair, open and above board.

The Structure of the Organisation

Bazalgette Tunnel Limited (BTL) is the licensed infrastructure provider set up to finance, build, maintain and operate the Thames Tideway Tunnel. BTL trades, and is known as, Tideway. Tideway is owned by a consortium of investors that comprises Allianz, Amber Infrastructure and Dalmore Capital. Construction is nearly complete and we are now in a period of system commissioning before we transition into an operational phase.

Tideway has its headquarters and operates solely in the United Kingdom. Tideway currently has around 66 employees and its Programme Manager, Jacobs, has 95 employees working with Tideway on the project. These numbers will reduce once Tideway reaches steady state operation. The Thames Tideway Tunnel (the Project) is being delivered under three separate construction contracts by three joint venture construction partners. Our supply chain includes these joint venture consortiums: Bam Nuttall Ltd, Morgan Sindall PLC, Balfour Beatty Group (BMB), Ferrovial Agroman UK Ltd, Laing O'Rourke Construction (FLO), Costain Ltd, Vinci Construction Grands Projects and Bachy Soletanche (CVB) – together with Amey OWR Ltd who are providing systems integration services. With construction activity now in the final stages, Tideway have procured additional service providers for delivery of project commissioning, operational and maintenance requirements.

Tideway's Stance on Modern Slavery and Human Trafficking

Tideway is committed to ensuring that there are no instances of modern slavery or human trafficking in our supply chains or in any part of our business. Tideway's anti-slavery stance reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in the Project.

Tideway strive for a sector-leading approach to modern slavery with appropriate and well communicated corporate policies, and a due diligence programme based on supply chain risk assessment. Tideway have implemented training across the organisation and work with key suppliers to mitigate the risk of modern slavery within our supply chain.

Tideway's processes and procedures to minimise the risk of Modern Slavery and Human Trafficking

Tideway has developed a range of commitments that supports ethical practices in the supply chain. These include paying the London Living Wage (LLW), paying suppliers within 30 days of invoice, requiring our supply chain to provide job security to the workforce by employing them wherever possible under direct employment contracts and ensuring that 100 per cent of our key building materials (cement, aggregates, steel) must be certified to either BES6001 Responsible Sourcing of Construction Products, CARES Sustainable Constructional Steel (SCS) or Eco-Reinforcement as applicable. Our processes and procedures include:

1) Supplier adherence to our values

Tideway have high expectations of our business partners, subcontractors and suppliers. All new suppliers are required to comply with our Honest and Ethical procurement policy and Tideway expect them to demonstrate a zero tolerance to any form of modern slavery and human trafficking. To this end we have in place a compliance programme which requires the joint venture consortiums and our new operational and maintenance suppliers to ensure they are compliant with the Modern Slavery Act 2015 and to provide confirmation of that each year.

Tideway complies with the ILO's Ethical Trading Initiative (ETI) and we require that all of our suppliers adhere to the ETI base code which sets out 9 minimum principles in relation to labour.

2) Due Diligence Processes for Modern Slavery and Human Trafficking

Practices that come within the ambit of Modern Slavery are numerous, complex and hidden. As part of our initiative to mitigate the risk of modern slavery and human trafficking in our supply chains, we have in place systems to:

- Identify and assess potential risk areas;
- Monitor those potential risk areas; and
- Protect whistle-blowers with our anonymous hotline

We routinely undertake our own risk assessment of Modern Slavery in our supply chain. We have developed a supply chain risk assessment process to support this (using methodology based on the Global Slavery Index - <https://www.globalslaveryindex.org>)

3) Right to Work

Tideway employees have a written contract of employment, and their right to work in the UK is established prior to their employment commencing. All employees are made aware of their statutory rights and in- work benefits during their induction process. We work with our joint venture partners and supply chain to ensure that this is the case for all their personnel working on the Project. Tideway's onboarding process includes an automated red flag raising system which identifies employees of Tideway, and employees of our Main Works Contractors and subcontractors, who do not have the right work in the UK, who may not be earning the London Living Wage, or whose domestic or travel arrangements appear unusual, and require further investigation. No one can gain access to work on our sites without going through this onboarding process and all employees who work full time on Tideway must be paid the London Living Wage or agreed equivalent in the case of young people and apprentices.

4) Policies and Training

Tideway have the following policies which employees are required to read and comply with while working on the Project and which help them to manage our modern slavery risk and recognise their responsibilities when identifying risks or concerns:

- Honest and Ethical Behaviour Policy;
- Whistle-Blowing Policy – supported by the anonymous whistleblowing hotline;
- Anti-Fraud, Corruption and Bribery Policy;
- Anti-Money Laundering Policy;
- Grievance Policy; and
- Bullying and Harassment Policy

Our policies can be accessed by staff on our intranet site. To ensure a high level of understanding of the risks of modern slavery and human trafficking in the business and in the supply chain, we provide mandatory, online Modern Slavery training for all staff during their induction process and regular updates to both Board members and senior management.

Approval

This statement (approved by the BTL Board) is made pursuant to section 54 (i) of the Modern Slavery Act 2015 and constitutes Tideway's Modern Slavery and Human Trafficking Statement for the financial year ending 31st March 2026.

Signed



Matt Parr
Chief Executive Officer, Tideway



Michael Queen
Chairman, Tideway