BauWatch

// UK Modern Slavery Act 2015 Transparency Statement

Financial year ended 31 December 2025

Introduction

This statement is made by BauWatch Group B.V. (“BauWatch” or “the Group”) pursuant to section 54 of the UK Modern Slavery Act 2015. It sets out the steps and measures that BauWatch has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain during the financial year ended 31 December 2025, including in our operations in the United Kingdom. We are committed to doing business the right way, which includes safeguarding human rights and preventing slavery and human trafficking. This statement should be read alongside our Group-level commitments and standards, including our Code of Ethics, Code of Ethics for Business Partners and Human Rights Statement.

Our organization

BauWatch is a provider of temporary site security solutions, including mobile surveillance towers, monitoring services and related technology. BauWatch supplies goods and services within construction, infrastructure and industrial sectors in 11 European countries. The Group is incorporated in The Netherlands. BauWatch UK Limited operates in the UK and in Ireland.

Our policies

- **BauWatch Code of Ethics:** Our Code of Ethics uses 8 principles to explain how we do business, the right way. It applies to all employees, directors, and temporary workers. Our Code includes BauWatch's commitment towards respecting human rights. Employees are trained on the BauWatch Code of Ethics annually in a dilemma-based training, as well as through dedicated training initiatives. The Code of Ethics and its topics are regularly discussed during company-wide townhalls, and are communicated regularly through (online and offline) awareness campaigns.

- **BauWatch Business Partner Code of Ethics:** Our Business Partner Code of Ethics sets expectations for suppliers, contractors, customers and other business partners. This includes expectations on human rights and working conditions, including child labour, modern slavery, human trafficking, fair and secure jobs for contract workers, non-discrimination, diversity, freedom of expression and freedom of association. We expect our business partners to act lawfully and ethically, consistent with our Business Partner Code and applicable labour standards. Where concerns arise, we expect cooperation with remediation and, where appropriate, we apply corrective action.

- **BauWatch Human Rights Statement:** Our Human Rights Statement confirms that respect for human rights is a core value of BauWatch and underlines our support of standards including the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the ILO Core Conventions, as well as applicable national laws.

- **BauWatch Whistleblowing Policy and Speak Up service:** We encourage all BauWatch employees as well as relevant third parties including workers in the value chain to report any concerns related to the activities and supply chain of our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Persons speaking up are protected from retaliation, and confidentiality is preserved. Through our Speak Up service, concerns can be reported anonymously.

Our supply chain

Our supply chain includes third party providers and contractors that may support delivery, installation, monitoring and other operational needs, as well as procurement of equipment and services via suppliers and service providers. We recognise that modern slavery risks may be elevated in parts of supply chains that rely on vulnerable labour, outsourced services or complex, multi-tier sourcing.

In the UK we have processes in place to map and audit parts of our Tier 1 supply chain. As we build a more comprehensive understanding of our multi-tier supply chain, we will integrate additional tiers into our monitoring and auditing processes to further strengthen our approach to preventing modern slavery and human trafficking.

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Our actions

During the reporting period, BauWatch has taken the following actions: (i) Setting clear expectations to employees and third parties through our Code of Ethics and Business Partner Code; (ii) Focusing on learning and awareness of employees through training and communication activities; (iii) Maintaining reporting channels for workers and others to raise concerns and (iv) in the UK deploying a supplier onboarding process, utilising SAQ's (Supplier Assessment Questionnaires) covering, amongst other things, modern slavery and human trafficking. The SAQs support initial supply-chain mapping and provide information on labour practices, recruitment methods, and the use of agency workers. BauWatch UK is also a SEDEX Supplier (Plus) member and aligns its due-diligence approach with the SMETA 4-pillar audit methodology as part of our commitment to continuous improvement.

Assessing effectiveness and KPIs

BauWatch will develop a set of key performance indicators (KPIs) to help indicate the effectiveness of our modern-slavery controls. These will be implemented across the UK business over time and aligned with our maturing due-diligence processes. Planned KPIs include:

- Completion rates of Supplier Assessment Questionnaires (SAQs) during onboarding
- Progress in mapping Tier 1 and, over time, additional supply-chain tiers
- Proportion of suppliers assigned a risk rating
- Training completion rates for relevant employees

These KPIs will support continuous improvement and help us track our progress year-on-year.

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Publication

This statement is published on our external website as well as on our intranet page.

Approval for this statement

This statement was approved by the Board of Directors of **BauWatch Group B.V.** and is signed by the CEO on its behalf.

Name: S B Ghelani, CEO

Date: 12/05/2026

Signature: 