

Dornan Engineering Limited its Subsidiaries and Branches
Hereafter for the purpose of this Statement known as **Dornan**



ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT



August 2026



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ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. INTRODUCTION

Across the Dornan Group (the “Group”) we are committed to maintaining and promoting the highest standards of ethical conduct and integrity in all our business activities. We have a zero-tolerance approach to modern slavery and human trafficking in any form. This statement outlines the steps the Group has taken and continues to take to prevent modern slavery and human trafficking within our operations and supply chains.

2. DORNAN GROUP’S BUSINESS AND STRUCTURE

Dornan Engineering Limited (DEL), headquartered in Cork, Ireland, is a provider of electrical, mechanical and instrumentation services within the construction sector. DEL operates across Ireland and mainland Europe, with established entities in Switzerland, Spain, and Germany and branch operations in Sweden, Denmark, Belgium, Finland and the Netherlands, delivering complex projects across multiple jurisdictions.

Dornan Engineering Services Limited (DESL), a subsidiary of DEL, is based in London, UK and is primarily responsible for the delivery of projects across the United Kingdom.

The Group also includes Kantor Energy Limited and Baddesley O&M, which specialises in the design and development of energy system solutions, facilities support and supporting projects primarily within the UK market.

Dornan Engineering Limited is part of the Turner Construction Company; a leading international construction services company. As part of the Turner group, Dornan operates within a broader global framework of governance, compliance and ethical standards.

The Group has over 1,400 employees and operates in Western Europe including the UK, Ireland, Sweden, Spain, Switzerland, the Netherlands, Germany, Belgium and Denmark. The Group has a global annual turnover of €1.2 billion.

3. OUR SUPPLY CHAINS

Dornan operates within a complex, multi-tiered supply chain typical of the construction sector, which includes subcontractors, labour agencies, equipment suppliers and material providers across Ireland, the United Kingdom and mainland Europe. A significant proportion of our workforce is engaged through subcontractors and agency partners, particularly for site-based roles. We recognise that this structure can present an increased risk of modern slavery, particularly in relation to agency labour, migrant workers and lower-tier supply chain



providers. To mitigate these risks, we require all subcontractors and agencies to adhere to our compliance processes, including the verification of Right to Work documentation and ongoing monitoring of workforce credentials prior to site access. We continue to strengthen our due diligence processes, enhance visibility across our supply chain, and work collaboratively with our partners to promote ethical labour practices and ensure compliance with applicable laws and standards.

4. POLICIES IN RELATION TO MODERN SLAVERY, HUMAN TRAFFICKING AND HUMAN RIGHTS

Dornan is committed to conducting business ethically and with integrity, and to respecting and promoting fundamental human rights across all its operations and supply chains, including the prohibition of forced labour, child labour and discrimination and respect for freedom of association.

Our commitment is underpinned by a comprehensive framework of policies and applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. These include:

- Anti-Slavery and Human Trafficking Policy.
- Human Rights Policy.
- Employee Code of Conduct.
- Code of Conduct for Business Partners.
- Compliance Policy.
- Whistleblowing Policy.
- Dignity and Respect at Work Policy.
- Diversity, Equity and Inclusion Policy.
- Equal Opportunities Policy.

We regularly review and update our policies and procedures to ensure they remain effective, proportionate and aligned with evolving legislation and best practice.

4.1. COMMUNICATION AND ENFORCEMENT OF POLICIES

Dornan is committed to ensuring that its policies on modern slavery, human trafficking and human rights are clearly communicated, understood and effectively implemented across the organisation and its supply chain.



All employees receive induction training on these policies and are required to sign the Employee Code of Conduct, which forms part of their terms and conditions of employment. Ongoing training and communications reinforce awareness. Our policies are also publicly available on our website to support transparency.

We extend these expectations to our supply chain through our Code of Conduct for Business Partners, which must be accepted as part of onboarding and is supported by contractual requirements. Dornan is a member of SEDEX, supporting our approach to ethical sourcing and supply chain transparency.

Compliance is monitored through regular risk-based spot checks and audits of subcontractors and labour agencies as part of our broader due diligence processes. These reviews include, but are not limited to, verification of workforce compliance documentation, reviews of working hours and payroll records, confidential worker interviews where appropriate, and other checks designed to identify indicators of forced labour, debt bondage and other forms of worker exploitation. Any issues identified through these reviews are investigated, with appropriate corrective actions agreed, implemented and monitored. Employees and third parties are encouraged to raise concerns through our confidential whistleblowing channels, with all reports investigated promptly and in accordance with our internal procedures.

Through training, contractual controls, monitoring and reporting mechanisms, Dornan seeks to ensure its policies are actively upheld across its operations and supply chain.

5. DUE DILIGENCE

Dornan has established due diligence processes to identify, assess and mitigate the risk of modern slavery and human trafficking across its operations and supply chain.

As part of our procurement process, all subcontractors, agencies and suppliers are subject to pre-qualification checks (PQs) and onboarding through our procurement system, ensuring compliance with legal and ethical standards before engagement. All business partners are also required to review and formally accept our Code of Conduct for Business Partners, which includes commitments to uphold human rights and adhere to our zero-tolerance approach to modern slavery. These requirements are reinforced through contractual obligations.

Following onboarding, Dornan continues to monitor compliance through a combination of spot checks and targeted audits, particularly in higher-risk areas such as labour supply and site-based activities. These checks are designed to identify indicators of modern slavery and ensure ongoing adherence to our standards.



Through these due diligence processes, Dornan maintains robust oversight of its supply chain and takes appropriate action where risks or non-compliance are identified.

6. RISK ASSESSMENT, MANAGEMENT & AUDIT CONTROLS

Dornan recognises that the construction sector presents an inherent risk of modern slavery due to complex, multi-tiered supply chains and reliance on subcontracted and agency labour. We take a risk-based approach, focusing on higher-risk areas such as labour agencies, subcontracted roles, lower-skilled work and migrant labour.

To mitigate these risks, we implement controls including pre-qualification and onboarding checks, supplier due diligence through our procurement systems, and mandatory adherence to our Code of Conduct for Business Partners.

We also carry out structured audits and spot checks, particularly in higher-risk areas. These are supported by defined work papers and include review of documentation such as worker lists, payslips, contracts and Right to Work processes.

During audits, we assess key risk indicators including recruitment practices, Right to Work verification, pay transparency, subcontracting controls, worker traceability and awareness of modern slavery.

Findings are documented, with corrective actions agreed and tracked to completion. Through these controls, Dornan aims to proactively identify and address risks and strengthen oversight across its supply chain.

7. MEASURING EFFECTIVENESS

Dornan monitors the effectiveness of its approach to preventing modern slavery through a range of Key Performance Indicators and ongoing review processes.

These include metrics relating to supply chain due diligence, workforce compliance, training and monitoring activities. We track the proportion of subcontractors and suppliers who complete our pre-qualification and onboarding processes, including acceptance of our Code of Conduct for Business Partners.

In addition, we track the number of audits and spot checks carried out across our subcontractors and labour agencies, particularly in higher-risk areas, and monitor the findings and closure of any corrective actions.

Internally, we monitor employee engagement through induction and training completion rates, including acknowledgments of our Employee Code of Conduct. We also review the use of our whistleblowing channels and the outcomes of any reported concerns.

These measures are reviewed on a periodic basis to assess the effectiveness of our controls, and to identify opportunities for continuous improvement.

8. TRAINING AND AWARENESS

Dornan is committed to ensuring employees understand the risks of modern slavery and are equipped to identify and respond to concerns across our operations and supply chain.

All employees complete annual mandatory compliance training, including modern slavery modules, alongside dedicated training to enhance awareness of risks and indicators. Modern slavery is also embedded in induction training, ensuring awareness from the outset, including how to recognise and report concerns through speak-up channels.

This is reinforced through regular compliance workshops, particularly for operational roles in higher-risk environments such as construction sites and labour supply chains.

Through this ongoing approach, Dornan ensures employees remain informed, vigilant and able to support the prevention of modern slavery.

9. GOVERNANCE, ACCOUNTABILITY & REMEDIATION

Dornan's Group Managing Director and Board of Directors has overall responsibility for ensuring that the organisation operates in accordance with its commitments to preventing modern slavery, human trafficking and human rights abuses.

Operational responsibility sits with the Legal, Compliance & Data Protection Department (LCD), which implements policies and monitors compliance through investigations, audits and spot checks, particularly in higher-risk areas.

Dornan maintains whistleblowing channels to enable confidential or anonymous reporting, with all concerns managed in line with a defined investigation protocol.

Where potential instances of modern slavery are identified, Dornan takes appropriate action, including investigation, engagement with the relevant party and implementation of corrective actions. Serious or repeated non-compliance may result in suspension or termination of the business relationship.

Dornan is committed to supporting affected individuals and, where appropriate, works with relevant stakeholders to ensure remediation and safeguard impacted workers.

10. LEGAL AND ETHICAL FRAMEWORK

Dornan operates in compliance with applicable legislation including:



- UK Modern Slavery Act 2015
- Criminal Law (Human Trafficking) Acts 2008-2013 Ireland
- Relevant EU Directives on human trafficking and labour standards
- UN Guiding Principles on Business and Human Rights
- ILO Core Conventions

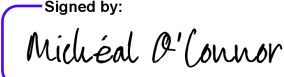
11. APPROVAL & PUBLICATION

This statement has been approved by the Board of Directors, signed by the Managing Director and is published in accordance with the requirements of the Modern Slavery Act 2015. This statement is published on Dornan’s website www.dornan.ie .

Change History Record

Issue	Description of Change	Approval	Date of Issue
0	Initial issue	Micheal O’Connor	28/07/2025
1	Expanded and updated statement content	Tracy Kelleher	05/08/2026
2	Final Approval	Micheal O’Connor	05/08/2026
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Signed by: 
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