

Modern Slavery & Human Trafficking Act 2015 Statement.

INTRODUCTION

This statement sets out the actions of Brymor Group Southern Limited (“the Business”) to understand all potential modern slavery risks related to the business and to put in place steps aimed at ensuring that there is no slavery or human trafficking within the company or associated supply chains. This statement relates to actions and activities during the financial year April 2022 to March 2023.

The Business recognises that labour exploitation and forced labour has the potential to be a risk factor in the construction industry and therefore preventative measures have been instigated where possible. As part of the construction industry, Brymor recognises there is a responsibility to take a robust approach to slavery and human trafficking. Brymor are absolutely committed to preventing slavery and human trafficking in its corporate activities and ensuring that its supply chains are free from slavery and human trafficking. Brymor does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Brymor Group Southern Limited is an independent construction company working across the South of England.

The business has a varied supply chain from construction package subcontractors to service and consultancy suppliers, working across different parts of the business spanning a wide range of skill levels. We have a supply chain management system to register, vet and monitor our subcontractors and service providers and a dedicated procurement manager to manage relationships.

The business procures materials and goods to service our business operations, but the majority of materials are sourced through our subcontractor supply chain and are specified to meet the needs of our clients and the projects we deliver for them. We consider ethical and sustainability criteria when sourcing materials and goods where it is within our remit to do so, and work with our clients to assist them in selecting sustainable and ethically sourced materials. When we provide design services, or procure materials and goods directly, we specify to industry standards for responsible and sustainably sourced material as outlined in our responsible sourcing and sustainability policies.

RESPONSIBILITY

Responsibility for the company’s anti-slavery initiatives are as follows:

- **Policies:** The HR director is responsible for monitoring and reviewing all associated policies such as the Anti-bribery & Corruption, Equality & Dignity, Agency Worker Management, Whistle-blower and Recruitment policies. The policies will be reviewed to ensure that there are relevant provisions in tackling slavery
- **Investigations/due diligence:** If any individual has any concerns or suspected instances of slavery and human trafficking, then the current advice given is that the employee raises the concern in accordance with the whistle-blowing policy and notify HR immediately
- **Training:** All employees must undertake training and periodic refresher online courses for all employees to raise awareness of recognising potential warning signs and what employees ought to do should they have concerns.

RELEVANT POLICIES

The Business operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** Brymor encourages all its employees, customers, supply chain and any other business partners to report any concerns without fear of reprisal. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Brymor's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation. Employees, customers or others who have concerns can complete a confidential whistle-blower form.
- **Supplier/Procurement code of conduct:** Brymor is committed to ensuring that its suppliers adhere to the highest standards of ethics by working with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, act ethically and within the law in their use of labour.
- Serious violations of Brymor supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency workers policy** The Business only uses specified, reputable employment agencies to source labour and always verifies the practices of any new agency before accepting workers.

DUE DILIGENCE

Brymor undertakes due diligence when considering on the introduction of new suppliers, and regularly reviews its existing suppliers. The company's due diligence and reviews include:

- reviewing on a regular basis all aspects of the supply chain based on the supply chain approval criteria
- conducting supplier assessments through supply chain software, which has a degree of focus on slavery and human trafficking where evidence is requested; namely the supplier's own policy and statement against the Modern Slavery Act 2015 and Immigration Asylum and Nationality Act Policy
- taking steps to improve suppliers' substandard practices, including providing advice to suppliers via the QHSE department

TRAINING

The Business requires all staff within the company to complete training on modern slavery. The modern slavery training covers;

- how to identify the signs of slavery and human trafficking
- what initial steps should be taken if slavery or human trafficking is suspected
- how to escalate potential slavery or human trafficking issues to the relevant parties within Brymor
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and the 'Stronger Together' initiative

SITE INDUCTIONS

All site inductions delivered on our construction sites include slides detailing how to identify the signs of Modern Slavery.

AWARNESS-RAISING PROGRAMME

As well as training staff, the Business has raised awareness of modern slavery issues by putting up posters across company premises as well as circulating a series of emails to staff.

The poster explains to staff:

- the basic principles of the Modern Slavery & Human Trafficking Act 2015
- how employers can identify and prevent slavery and human trafficking
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline

BOARD APPROVAL

This statement has been approved by Brymor Group Southern Limited's board of directors, who will review and update it annually.



M Dyer
Managing Director
April 2022