

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Brenmar is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chains and imposes the same high standards on its suppliers. We have a zero-tolerance approach to modern slavery and human trafficking in all forms.

This policy is developed in compliance with the UK Modern Slavery Act 2015. It applies to all individuals working for Brenmar on its behalf in any capacity, including employees (permanent and temporary), directors, agency workers, contracted staff, consultants, and third-party representatives, regardless of their location.

Due Diligence and Risk Assessment

Given the nature of the construction sector, there is an inherent risk of modern slavery, particularly concerning sub-contracted labour and materials sourced from high-risk countries.

Risk Identification We assess the risk of modern slavery across our operations by focusing on:

- **Geographic Risk:** Sourcing materials or labour from regions with known labour rights abuses or weak legal frameworks.
- **Sectoral Risk:** Areas of our business that rely heavily on low-skilled, transient, or agency labour.
- **Supply Chain Tiers:** Lower tiers of the supply chain (e.g., raw materials suppliers) where visibility is reduced.

Mitigation Steps

- We use only reputable, nationally recognised employment agencies and conduct due diligence before accepting new agencies.
- We commit to sourcing high-risk materials (e.g., timber, steel) from certified schemes where possible (e.g., FSC certified timber).
- We reserve the right to audit suppliers on short notice.

Supply Chain Management

Brenmar operates a multi-tiered supply chain. The following measures are taken to ensure compliance:

Supplier Vetting We require all new and existing suppliers, contractors, and sub-contractors to:

- Confirm they have their own policies and procedures in place to combat modern slavery.
- Complete a Pre-Qualification Questionnaire as part of our procurement process.

Contractual Requirements All contracts issued by Brenmar contain:

- A specific clause requiring adherence to the Modern Slavery Act 2015.
- The right to terminate the contract immediately if any instance of modern slavery or trafficking is found within their organisation or supply chain.

Auditing and Monitoring We conduct periodic risk-based audits. These audits focus on:

- Recruitment practices and verification of identity documents.
- Working hours, pay, and accommodation standards.

- The freedom of workers to leave their place of work.

Recruitment and Employment Practices

We ensure that our direct employees and those working on our sites are treated fairly and ethically.

Right to Work and Identity We verify the identity and legal right to work of all employees and workers before employment commences. Original documentation is inspected, and copies are kept securely.

Fair Compensation We ensure all employees are paid at least the legal National Minimum Wage or National Living Wage, and that wages are paid directly into a bank account in the worker's name.

Training and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking, we provide All employees mandatory awareness training on the signs of modern slavery and how to report concerns. Training materials are reviewed and updated annually

Reporting

Any person who suspects or has concerns regarding modern slavery or human trafficking must report it immediately.

Report concerns immediately to Louise Hinckley on 01489 891196.

Brenmar will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. We ensure that no individual suffers detriment as a result of reporting a genuine concern related to modern slavery.

Review

This policy will be reviewed annually, or more frequently if there are changes in legislation, the organisation's structure, or the nature of its supply chain.

Signed



Mark Harvey

Director

November 2025