

Modern Slavery Statement

Introduction

Modern slavery is a crime and a violation of basic human rights which impacts millions of people worldwide. Modern slavery deprives its victims of their liberty and exploits them for personal or commercial gain.

Section 54 of the Modern Slavery Act 2015 (MSA) requires commercial organisations that supply goods or services, carry on business in the UK and (together with their subsidiaries) meet an annual turnover threshold of £36m or more to publish a modern slavery and human trafficking statement.

This statement is made by Brickability Group PLC on its own behalf and on behalf of all of its subsidiary companies that together form the Brickability Group (the Group).

Organisational structure

The Group operates across four divisions – Bricks and Building Materials, Contracting Services, Importing and Distribution. The Group employs over 600 staff and has an annual turnover of approximately £520 million for the year ended 31 March 2022. The Group operates from over 55 sites located in the UK and also operates a roof tile joint-venture in Germany. All UK based employee are paid the market rate and the Group adheres to UK legislation to ensure that all UK based employees receive at least the minimum wage.

Our supply chains

Our supply chain includes professional services providers, product suppliers, engineering & electrical suppliers and energy suppliers. We recognise that risks of labour abuse could occur in second and third tier suppliers in certain industries and we have undertaken risk analysis to understand how this impacts our suppliers. Most of our suppliers are based in either the UK or in Europe and are large reputable companies. The risk of modern slavery is deemed to be low in these jurisdictions although we do takes steps to ensure that such suppliers and third parties take responsibility for controlling their own supply chain, and this is reiterated in our policy on working with third parties and is included in our supplier contracts.

Where suppliers are based outside of Europe we have engaged with a global leader in assurance services to conduct audits to ensure that modern slavery is not an issue in these supply chains.

Our policy on slavery and human trafficking

The Group is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

It is the intention that our Purchasing Policy and Supplier Code of Conduct will be reviewed on an annual basis and if required updated to ensure these policies adequately reflect our zero-tolerance policy and that our suppliers are similarly committed to the eradication of modern slavery from their supply chains.

As detailed in our Environmental, Social and Governance Strategy document which can be viewed at <u>Brickability-Group-</u> <u>PLC-ESG-Strategy.pdf (brickabilitygroupplc.com)</u> we have instituted a Modern Slavery Training Programme for all employees to make them aware of and how to report suspicions of modern slavery. Completion of this training will form a compulsory part of our employees' annual review and new starter induction processes.



Our responsibilities

In order to monitor and enhance the effectiveness of our approach to modern slavery and further embed our zerotolerance approach to modern slavery and human rights abuses within our business and its supply chain, we will take the following steps:

- We will fully investigate and take appropriate action if any modern slavery-related events are reported to us directly or through our independent whistleblowing channels;
- Ensure that our employees remain vigilant to possible indicators of modern slavery, can identify potential risks themselves and know how to report a suspected incident of modern slavery; and
- Continue to keep our practices, procedures and training programmes under review to ensure their on-going effectiveness and suitability.

This Statement has been approved by the Board of Brickability Group PLC on behalf of the Group and in accordance with the requirements of the MSA it will be reviewed and updated annually.

Alan Simpson Chief Executive Officer

Date 28 March 2023