

Modern Slavery Statement

1. Introduction

Modern slavery is a crime and a violation of basic human rights, affecting millions of people globally. It deprives individuals of their liberty and exploits them for personal or commercial gain.

Brickability Group PLC is committed to ensuring that modern slavery and human trafficking have no place in our operations or supply chain. We have established clear processes for identifying, preventing, and remediating instances of modern slavery, in line with the UK Modern Slavery Act 2015 and international best practices.

This policy applies to Brickability Group PLC and all subsidiaries within our Group.

2. Organisational Structure

The Group operates across four divisions – Bricks and Building Materials, Importing, Distribution, and Contracting. We employ over 800 staff and have an annual turnover of approximately £594 million (as of 31 March 2024).

All UK-based employees receive at least the minimum wage and are paid the market rate. The Group adheres to UK employment legislation and expects all suppliers to comply with the same standards.

3. Our Supply Chain

Our supply chain includes professional services providers, product suppliers, engineering & electrical suppliers, and energy suppliers. We recognise that modern slavery risks may be present in second and third-tier suppliers, particularly in higher-risk regions.

To mitigate these risks, we:

- Conduct risk assessments on suppliers in high-risk regions and, where necessary, require third-party audits.
- Include contractual clauses in supplier agreements prohibiting modern slavery and forced labour.
- Monitor compliance through due diligence processes, including supplier self-assessments and audits where appropriate.

4. Policy on Modern Slavery and Human Trafficking

Brickability Group PLC has a zero-tolerance approach to modern slavery. We expect all employees, contractors, and suppliers to share this commitment.

In the event of an identified issue, we follow a structured Remediation Plan, which outlines corrective actions, supplier engagement processes, and worker support mechanisms.

We require all suppliers to:

- Adhere to our Modern Slavery Policy and contractual anti-slavery clauses.
- Demonstrate compliance through risk-based due diligence measures.
- Engage in corrective action if issues are identified, rather than immediate contract termination where remediation is possible.

5. Whistleblowing and Reporting Mechanisms

We encourage employees and supply chain workers to report any concerns about modern slavery or unethical labour practices. To support this, we have extended our Whistleblowing Policy to allow supply chain workers to report issues confidentially and without fear of retaliation.

Reports can be made via the whistleblowing channel, and all concerns will be fully investigated.

6. Training and Awareness

We have implemented a Modern Slavery Training Programme for all relevant employees to ensure awareness of risks, reporting procedures, and compliance requirements.

7. Governance and Review

The Board of Directors oversees the implementation of this policy, ensuring compliance with legal requirements and industry best practices. This policy will be reviewed annually and updated as necessary.



Frank Hanna
Chief Executive Officer

Date: 02 April 2025

Modern Slavery Response and Remediation Plan

1. Purpose

This plan outlines Brickability Group PLC's approach to identifying, preventing, and remediating modern slavery risks within our operations and supply chain. It ensures compliance with the UK Modern Slavery Act 2015 and international best practices.

2. Identifying Modern Slavery Risks

We take a risk-based approach to identifying modern slavery within our supply chain and business. This includes:

- Supplier risk assessments for suppliers in higher-risk regions or industries.
- A confidential whistleblowing channel for suppliers to enable safe reporting of concerns.
- Review of supplier compliance as part of ongoing engagement.

3. Preventing Modern Slavery

We work proactively to prevent modern slavery through:

- Updating all supplier contracts to include a modern slavery clause, setting out our expectations.
- Training for key staff to ensure awareness of modern slavery risks and reporting procedures.
- Strengthening supplier engagement as we develop a clearer understanding of country-of-origin risks.

4. Remediating Modern Slavery Issues

If modern slavery is identified, we take corrective action as follows:

Step 1: Immediate Response

- Escalate the issue internally to the Senior Leadership Team and ESG Lead.
- Engage the supplier to verify findings and determine if remediation is possible.

Step 2: Corrective Action Plan (If Remediation is Possible)

- Require the supplier to take immediate corrective actions, such as:
 - Ceasing exploitative labour practices.
 - Improving working conditions.
 - Reimbursing affected workers where applicable.
- Monitor progress to ensure compliance within agreed timeframes.

Step 3: Escalation (If Remediation Fails)

- Suspend or terminate supplier contracts if they fail to take corrective action.
- Report to authorities where necessary, in line with legal requirements.
- Consider responsible disengagement to avoid harm to affected workers.

5. Governance & Continuous Improvement

- The Board reviews modern slavery risks and responses annually.
- Supplier contract updates will be rolled out to strengthen compliance.
- This plan will be reviewed annually to align with evolving regulations and best practices.