

ANTI-SLAVERY POLICY

1. Introduction and Scope

- 1.1. This is the Breedon Group (**Breedon**) policy on anti-slavery and human trafficking.
- 1.2. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, and involve the exploitation of them for personal or commercial gain.
- 1.3. Breedon has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.4. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.5. This policy applies to all companies within Breedon, located in either England, Scotland, Wales, Northern Ireland or the Republic of Ireland, and any other jurisdiction in which Breedon operates.
- 1.6. This policy applies to all employees of Breedon, working at all levels, grades and roles whether permanent or temporary, full or part time.
- 1.7. Any breach of this policy will be regarded as a serious matter by Breedon. If you are an employee this is likely to result in disciplinary action up to and including summary dismissal.

2. Objective

- 2.1 To set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking.
- 2.2 To provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

3. Modern Slavery Principles

- 3.1 Modern slavery is a brutal form of organised crime in which people are treated as commodities and exploited for criminal gain.
- 3.2 It is an international crime, affecting an estimated 45.8 million people around the world. It is a global problem that transcends age, gender and ethnicity. It is not an issue confined to history or an issue that only exists in certain countries. It is something this is still happening today, and it happens here in the UK and Ireland.

- 3.3 Modern slavery can take many forms including:
- (a) **Trafficking of people** (arranging or facilitating the travel of another with a view to exploiting them, even where the victim consents to the travel).
 - (b) **Exploitation** (sexual; criminal acts such as drug trafficking or shoplifting; forced benefit fraud; forced begging; organ removal; forced marriage and illegal adoption).
 - (c) **Domestic servitude or slavery** (where ownership is exercised over a person; the obligation to provide services imposed by coercion; freedom is restricted and they are forced to work long hours often for little or no pay).
 - (d) **Forced or compulsory labour** (work or service obtained from a person under the threat of a penalty or violence and for which the person has not offered themselves voluntarily).
- 3.4 As modern slavery is a hidden crime which is constantly developing, it can be hard to recognise. Criminals engaging in this activity are becoming more sophisticated in how they cover up their dealings and so it is important for organisations to be as vigilant as possible.
- 3.5 Victims can be any age, gender or ethnicity or nationality. Whilst by no means exhaustive, this is a list of some common signs:
- (a) is the person in possession of their legal documents (passport, bank card, identification) or are these held by someone else?
 - (b) do they have few personal possessions and often wear the same clothes?
 - (c) are they dropped off and collected from work, often very early or very late?
 - (d) does the person seem fatigued, look malnourished, unkempt or appear withdrawn?
 - (e) are they suffering any personal injuries?
 - (f) do they seem to be controlled, avoid eye contact and rarely interact with others?
 - (g) are there a group of workers who live at the same address or have their wages paid into the same account?
- 3.6 It is a criminal offence for a person or organisation to engage in any form of modern slavery.

4. Your responsibilities and how to raise a concern

- 4.1 You must ensure that you read, understand and comply with this policy.
- 4.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3 You must notify your line manager, the Compliance Team or via the whistleblowing hotline as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.
- 4.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 4.5 You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help

them address coercive or exploitative work practices in their own business and supply chains.

4.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager, the Compliance Team or via the whistleblowing hotline.

4.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Team immediately.

5. Training and communication

5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of our training and is provided as necessary.

5.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners and can be adhered by them committing to comply with our Supplier Code of Conduct.

6. Where do I go for help or advice?

6.1. If you have any questions or concerns, immediately contact the Compliance Team or you can report them anonymously via the whistleblowing hotline, the details of which are set out below:

Name	Telephone and e-mail
James Atherton-Ham Group General Counsel	D: 01332 694404 M: 07514 315949 james.atherton-ham@breedongroup.com
Lorna Coxon Head of Legal	D: 01433 622323 M: 07802 873723 lorna.coxon@breedongroup.com

Safecall details:
Telephone: from England, Scotland, Wales and Northern Ireland call the freephone number 0800 915 1571 or from the Republic of Ireland call 1800 812 740. Your call will be transferred to a specially trained person who will assist you further
Online: leave a message on the Safecall website at www.safecall.co.uk/report

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