



**Modern Slavery and Human
Trafficking Statement**

March 2025

Modern Slavery and Human Trafficking Statement

Introduction

This annual transparency statement is made on behalf of Breedon Group plc and its subsidiaries (collectively “**Breedon**”¹) and sets out the measures we have taken regarding modern slavery and human trafficking during the financial year ending 31 December 2024.

It continues to be a priority for Breedon to ensure that it trades ethically, sources responsibly and works to improve its own practices in order to better identify, prevent and mitigate the risk of modern slavery in its business and supply chains. This annual statement helps to monitor and report on the progress Breedon has made and to consider opportunities for us to further improve our processes.

Breedon has a zero-tolerance approach regarding any type of modern slavery and expects the same standards from those we do business with. We aim to ensure that safe, sustainable, legal and ethical work practices are maintained within both our business and our supply chain. For Breedon this is not simply about legal compliance but is central to the type of responsible business we want to be.

By continuously assessing relevant risks, Breedon aims to iteratively improve policies and processes and to remain proactive in addressing issues related to human rights, modern slavery and environmental sustainability.

Who we are and what we do

Breedon is a leading vertically integrated construction materials group in Great Britain, Ireland and the US and is opposed to slavery and human trafficking wherever it might occur.

Breedon employs around 4,500 people operating across approximately 350 sites with group revenue of around £1.5 billion.

Breedon uses its core assets to produce valued-added downstream products, pulling through aggregates and cement to deliver asphalt, ready-mixed concrete and surfacing solutions to the whole construction supply chain.

Our identification of risks

Internal risks

Breedon recognises that recruitment remains the primary area of internal risk in relation to modern slavery and we work with our colleagues to help them identify signs of modern slavery including forced labour or exploitation.

Our supply chain risks

Our supply chain is made up of a diverse mix of suppliers, who are predominantly based within the jurisdictions in which we are located and are often local to Breedon’s operations. These include the suppliers of raw materials without which we could not produce our products and principally include aggregates, bitumen, cement, fuel (including electricity and production fuels), admixtures and extenders; providers of goods, services and facilities which assist in the operation of our business and include labour, haulage and operating services; and the suppliers of capital items, including fixed and mobile plant, buildings and other operating machinery.

Use of our risk matrix helps us to assess our categorised suppliers to identify potential risks of slavery and human trafficking in our supply chain. This risk matrix is fundamental to our working relationships with our suppliers.

In considering modern slavery risks within our supply chain, we will consider a number of factors as appropriate, including:

- (a) Geographic location
- (b) Sector and industry
- (c) Business model
- (d) Supplier relationships
- (e) Workforce characteristics

How we prevent and mitigate risks

Our policies

Breedon is opposed to slavery and human trafficking wherever it might occur, and it has a number of policies and codes in place to manage and mitigate the risk of such practices and demonstrate our zero-tolerance approach. These include:

- Code of Conduct (“**Code of Conduct**”) The Code of Conduct is applicable to all Breedon colleagues and enforces Breedon’s commitment to the highest ethical standards. This is underpinned by our health and safety culture supporting our efforts to provide a safe working environment for all colleagues.
- Supplier Code of Conduct (“**Supplier Code**”) The Supplier Code establishes the minimum standards that must be met by entities that supply products or services to Breedon. Acceptance of our Supplier Code is a contractual obligation in our standard purchase terms and conditions. The Supplier Code imposes obligations in respect of several matters linked to modern slavery and human trafficking. Our Supplier Code is available here: [Supplier Code](#)
- Anti-Slavery Policy Breedon’s Anti-Slavery Policy reflects our commitment to act ethically and with integrity both internally and externally and aims to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

¹ Breedon includes Breedon Trading Limited (00156531), Breedon Cement Limited (08284549) and Whitemountain Quarries Ltd (N1018140) who fall within the direct scope of reporting

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○ Whistleblowing Policy

Breedon has well established and effective grievance and whistleblowing processes that allow colleagues to raise concerns and challenges (anonymously if needed), without fear of retaliation. Concerns can be raised through Safecall, who provide an independent and external service. Whistleblowing reports are considered by a designated whistleblowing committee and investigated where appropriate in a proportionate manner.

Our due diligence and onboarding processes

Our onboarding processes for new colleagues include a standard right to work check where applicable in the local jurisdiction, which must be completed before a new colleague is added to our payroll.

We aim whenever possible to work with suppliers who we can trust and with whom we can communicate effectively, especially on new areas of law which they may not be familiar with. All key supplier relationships are reviewed regularly.

In Great Britain and Ireland, suppliers are onboarded centrally to ensure greater consistency in our approach. We are considering how we may implement a similar approach in the US. Our standard terms require suppliers to comply with, amongst other things, our Anti-Slavery Policy, the Supplier Code and other relevant laws.

This onboarding process ensures key information and commitments are captured for every new supplier, regardless of size and product/service being provided. Additionally, in certain parts of the business, we have partnered with Avetta to help us conduct more in-depth due diligence on suppliers where increased risk is identified. We refresh certain supplier data on an annual basis to ensure that we have up to date due diligence information

Breedon conducts a selective supplier audit programme designed to review supplier pre-qualification information, compliance with the Supplier Code and applicable laws around subjects such as Modern Slavery, Human Rights and Human Trafficking, Anti-Bribery and Corruption and Health, Safety and Wellbeing.

Our Training

New starters to Breedon in 2024 received an invitation to complete a specific Code of Conduct and modern slavery online training course within the first few months of their start date. This enables those colleagues to understand Breedon's approach to and the importance of modern slavery and identifies key signs of modern slavery to be aware of in their day-to-day activities.

Additionally, during 2024, over 1,200 colleagues within the business have received refresher Code of Conduct and modern slavery training, with other colleagues enrolled and due to complete the course early in 2025.

With the acquisition of a third platform in the US in 2024 we are developing methods of delivering effective Code of Conduct and modern slavery training in 2025.

In addition to the formal training outlined above, we display posters across operational sites that serve as a regular reminder about the risks and signs of modern slavery.

Mandatory whistleblowing training took place across the Great Britain and Ireland business in 2024 to ensure that colleagues know how to raise concerns they may have, which will be extended to the US in 2025.

MONITORING EFFECTIVENESS

We conducted a colleague engagement survey in late 2024, the results of which will be reviewed and key learnings agreed and developed.

We regularly engage with all key suppliers across all jurisdictions and maintain robust operational relationships. We continually monitor and assess our supply chain partners through various mechanisms such as annual updates, supplier review meetings and supplier audits.

These practices are reflected, where applicable, by our maintenance of the BES 6001 (Responsible Sourcing in Construction Products) accreditation with over 240 sites now independently certified as being a source of responsible construction materials.

In 2024, a supplier audit programme was developed to help provide us with improved insight into the effectiveness of our activities. The programme is designed to assess certain suppliers identified by the category management team who they feel warrant an audit based on risk, spend and relationship. The audits themselves review supplier pre-qualification information, compliance with our Supplier Code and compliance with applicable laws around subjects such as Modern Slavery, Human Rights and Human Trafficking, Anti-Bribery and Corruption and Health, Safety and Wellbeing.

The audits are predominantly conducted by the Sustainable Supply Chain Manager in Great Britain and Ireland, in collaboration with the relevant Category Manager and other relevant stakeholders. When the programme was launched in late 2024, key suppliers with a contractual relationship managed by the procurement function were identified for audit and spend with those audited suppliers was just over £54 million. This activity is planned to increase in the next year.

Breedon's Whistleblowing Policy and associated procedure was externally reviewed in 2024 with only minor recommendations all of which have been implemented.

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PROGRESS IN THE YEAR

In the past 12 months we have made further progress to address those risks and improve outcomes for workers in our business and supply chains by:

- Improving our risk matrix to better assess categorised suppliers and identify comparative risks of slavery and human trafficking.
- Recruitment of a dedicated Sustainable Supply Chain Manager who ensures this risk matrix is fundamental to the relationships we have with our suppliers.
- Appointment of a Senior Legal Counsel in Regulatory and Compliance UK to provide more dedicated focus to this topic from a legal and regulatory perspective.
- Recruitment of two new Category Managers to manage major capital investment and repair and maintenance procurement categories.
- An enhanced new supplier process, with a new supplier form which expressly highlights and requests confirmation that the supplier agrees to comply with the human rights and other expectations set out in the Supplier Code.
- The development of a new supplier tracker that improves the identification and management of modern slavery (and other) risks. The 'Freedom House Index' is used to assess country risk, alongside consideration of other risk factors.
- Engagement with a new partner in the UK (Avetta) to provide a more robust supplier pre-qualification due diligence process.

FUTURE ACTION

We support stakeholder expectations to respect human rights and address any adverse impacts we may create in operating our business. This is aligned to our purpose to make a material difference to the lives of our colleagues, customers and communities.

Breedon is committed to continuous improvement in respect of its responsible business conduct. During the upcoming year, the following targeted actions are planned to further strengthen the identification, prevention and mitigation of Breedon's modern slavery risks:

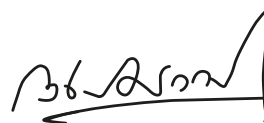
- Breedon will further embed its new supplier process, ensuring that new suppliers, wherever possible, go through the appropriate pre-qualification due diligence and that further due diligence is carried out where heightened risks are identified.

- Breedon will increase its auditing activity of suppliers to provide increased assurance that suppliers are acting in accordance with required standards.
- Breedon will review its Supplier Code with the intention of strengthening provisions relating to modern slavery and human trafficking.
- The Anti-Slavery Policy will be reviewed and updated to provide additional clarity on how Breedon identifies, prevents and mitigates modern slavery and human rights risks.
- Breedon will reflect on the role of managers and how they can further help us to mitigate the risk of modern slavery within our operations.
- Outside of mandatory training, additional communication methods will be identified to help increase awareness amongst colleagues of modern slavery risks and how they can raise any concerns they may have.
- We will consider harmonising our approach across the new jurisdictions in which Breedon now operates.

GOVERNANCE AND COMPLIANCE

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2024. Breedon will continue to review, update and publish this statement annually.

This statement was approved on 4 March 2025 by the Board of Directors of Breedon Group plc and signed for and on behalf of the Board.



Rob Wood, Chief Executive Officer
March 2025

