



MAKING A MATERIAL
DIFFERENCE

Modern Slavery and Human Trafficking Statement

March 2026

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 Breedon has taken regarding modern slavery and human trafficking during the financial year ending 31 December 2025.

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 it to further improve its processes.

Breedon is strongly opposed to any form of modern slavery and expects the same stance from those it does business with. Breedon aims to ensure that safe, sustainable, legal and ethical work practices are maintained within both its business and its supply chain. For Breedon this is not simply about legal compliance but is central to the type of responsible business it wants 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.

About Breedon

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 4,900 people operating across more than 350 sites with group revenue of around £1.6 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.

Identification of risks

Internal risks

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

Supply chain risks

Breedon’s supply chain is made up of a diverse mix of suppliers, who are predominantly based within the jurisdictions in which it is located and are often local to Breedon’s operations.

Use of a risk matrix helps Breedon to assess its categorised suppliers to identify potential risks of slavery and human trafficking in its supply chain. This risk matrix is fundamental to Breedon’s working relationships with its suppliers.

In considering modern slavery risks within its supply chain, a number of factors are considered as appropriate, including:

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

How Breedon prevents and mitigates risks

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 its 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 a health and safety culture supporting 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 its Supplier Code is a contractual obligation in Breedon’s standard purchase terms and conditions. The Supplier Code imposes obligations in respect of several matters linked to modern slavery and human trafficking. The Supplier Code is available here: [Supplier Code](#)
- **Human Rights Policy**
Breedon’s Human Rights Policy reflects its commitment to act ethically and with integrity both internally and externally. The policy aims to ensure that fundamental human rights are respected and that slavery and human trafficking is not taking place anywhere in its business or supply chains.
- **Whistleblowing Policy**
Breedon has well established and effective whistleblowing and grievance 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.

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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Due diligence and onboarding processes

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 Breedon's payroll.

Breedon aims whenever possible to work with suppliers it can trust and with whom it 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 approach. Breedon's standard terms require suppliers to comply with, amongst other things, its Human Rights 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, Breedon has partnered with Avetta to help it conduct more in-depth due diligence on suppliers where increased risk is identified. Breedon reviews supplier data regularly.

In 2025, Breedon has developed and deployed an AI-based supplier audit tool which helps to ensure a consistent detailed review of documentation provided by suppliers in order to map the maturity of the documentation provided and suggest areas for improvement where needed.

Breedon continues to develop its 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.

Training

Throughout 2025 Breedon has developed a new suite of mandatory core legal compliance training courses that aim to be more practical and tailored to its operations. This updated training has now been rolled out across Great Britain and Ireland, with improved systems put in place to monitor completion rates across Breedon and escalate any issues with non-compliance.

Of relevance to Breedon's work on modern slavery, the following topics are covered by mandatory training modules:

- Human Rights (incorporating modern slavery)
- Code of Conduct
- Whistleblowing.

All new starters to Breedon must complete these training courses within the first few months of their start date. This enables those colleagues to understand Breedon's approach to modern slavery, know how to identify key signs of modern slavery and be aware of how to proactively raise concerns.

In addition to the online training courses, Breedon has also spent time improving other core legal compliance training resources that can be delivered on site to ensure that all relevant colleagues are being reached by its training.

Breedon has been able to extend its online learning platform and resources to colleagues in the US during 2025. The core legal compliance training referenced above will be rolled out to US colleagues in 2026.

Monitoring effectiveness

Breedon regularly engages with all key suppliers across all jurisdictions and maintains robust operational relationships. Breedon continually monitors and assesses its supply chain partners through various mechanisms such as annual updates, supplier review meetings and supplier audits.

These practices are reflected, where applicable, by its 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 2025, an increased number of suppliers were audited across Breedon's supply chain. 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.

Breedon's core legal compliance training was internally audited in 2025 resulting in positive findings with a number of discrete areas identified for further improvement, all of which have now been actioned.

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In Breedon's last Modern Slavery Statement it planned the following improvement	During 2025 Breedon took the following action
Breedon will increase its auditing activity of suppliers to provide increased assurance that suppliers are acting in accordance with required standards.	Breedon has increased its auditing activity this year, conducting substantially more audits across the year. It has also utilised AI technology to enhance its auditing activity.
Breedon will review its Supplier Code with the intention of strengthening provisions relating to modern slavery and human trafficking.	Breedon has made various amendments to its Supplier Code, strengthening provisions relating to human rights abuses (including modern slavery). It has also created and made available an accessible overview document of key provisions.
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.	This policy has been updated as suggested and expanded to incorporate other human rights considerations; it has therefore been renamed as Breedon's Human Rights Policy.
Breedon will reflect on the role of managers and how they can further help us to mitigate the risk of modern slavery within its operations.	Specific communication channels have been identified which the Compliance Team intend to use next year to provide targeted messaging to managers.
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.	Breedon has created and distributed an accessible overview of its Code of Conduct. The document covers various areas including human rights abuses and how to raise concerns anonymously in line with its Whistleblowing Policy.
Breedon will consider harmonising its approach across the new jurisdictions in which it now operates.	Colleagues across all jurisdictions in which Breedon operates have been involved in reviewing compliance policies and training. Harmonised group-wide training has been devised.

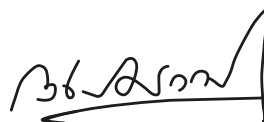
The following actions are planned in 2026

- Breedon will maintain auditing activity across its supplier group and consider areas for improvement within the auditing process.
- Breedon will review its Human Rights Policy and seek to incorporate any additional human rights issues relevant to the jurisdictions in which it operates which are not already captured, for example consideration of indigenous people.
- Breedon will provide targeted messaging to managers about how they can further mitigate modern slavery risks.
- Breedon will develop and deliver in-person core legal compliance training to continue to embed a compliance culture across the jurisdictions in which it operates.
- Breedon will roll out core legal compliance training to colleagues in the US to ensure a consistent approach throughout its business.
- Breedon will continue to seek opportunities to raise awareness of modern slavery risks across its sites.

Governance and compliance

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Breedon's slavery and human trafficking statement for the financial year ending 31 December 2025. Breedon will continue to review, update and publish this statement annually.

This statement was approved on 10 March 2026 by the Board of Directors of Breedon Group plc and signed for and on behalf of the Board.



Rob Wood, Chief Executive Officer
March 2026

