

Modern Slavery & Human Trafficking Policy

1. Purpose

Browne is committed to conducting business ethically, responsibly and with integrity. We have a zero-tolerance approach to modern slavery, servitude, forced labour, compulsory labour, debt bondage and human trafficking in any form.

The purpose of this policy is to:

- Prevent modern slavery and human trafficking within Browne's operations and supply chains.
- Ensure compliance with the Modern Slavery Act 2015.
- Establish clear responsibilities for employees, managers, suppliers and subcontractors.
- Promote ethical recruitment and employment practices.
- Support the identification, prevention, reporting and investigation of modern slavery concerns.
- Protect workers from exploitation and abuse.
- Drive continual improvement in the management of modern slavery risks.

This policy should be read in conjunction with HR-S03-PO-02 Annual Modern Slavery Statement, which describes the actions taken during each financial year to prevent modern slavery and human trafficking within Browne's business and supply chains.

2. Scope

This policy applies to all companies within the Browne Group, including:

- J Browne Group Holdings Ltd
- J Browne Construction Co Ltd
- J Browne Plant Ltd
- Enisca Browne Ltd
- Profitec Ltd
- Enisca Ltd
- Kemada Ltd

This policy applies to directors, employees, agency workers, temporary workers, labour only suppliers, subcontractors, suppliers, consultants, contractors and any person or organisation acting on behalf of Browne

Browne operates within the civil engineering and infrastructure sector and engages a diverse supply chain including recruitment agencies, labour providers, labour-only suppliers, subcontractors, plant hire providers, material suppliers, professional service providers and logistics organisations. These activities create a responsibility to identify, assess and manage modern slavery risks throughout our operations and supply chains.

3. Policy Statement

Browne is committed to:

- Acting ethically and with integrity in all business relationships.
- Preventing modern slavery and human trafficking in all forms.
- Protecting the rights, dignity and wellbeing of workers.
- Maintaining effective systems and controls to minimise modern slavery risks.
- Encouraging concerns to be raised without fear of retaliation.
- Working collaboratively with suppliers and subcontractors to promote ethical business practices.
- Complying with all applicable legislation relating to modern slavery, labour rights and human rights.

Browne will not knowingly engage with any organisation or individual involved in slavery, servitude, forced labour, compulsory labour, human trafficking or worker exploitation.

4. Definitions

Modern Slavery	Modern slavery is an umbrella term used to describe offences including slavery, servitude, forced or compulsory labour and human trafficking.
Human Trafficking	Human trafficking involves arranging or facilitating the movement of a person for the purpose of exploitation.
Forced or Compulsory Labour	Work or service performed under threat, coercion, intimidation, deception or abuse of vulnerability where the individual has not freely offered themselves for the work.
Labour Exploitation	Treatment of workers that may include: • Withholding wages. • Unlawful deductions. • Excessive working hours. • Poor living conditions. • Retention of identity documents. • Restriction of movement. • Threats, intimidation or coercion. • Recruitment fees charged to workers.

5. Roles and Responsibilities

5.1 Managing Director

The Managing Director has overall responsibility for ensuring Browne complies with its legal and ethical obligations relating to modern slavery and human trafficking.

Responsibilities include:

- Providing leadership and commitment.
- Approving the Annual Modern Slavery Statement.
- Ensuring appropriate resources are available to manage modern slavery risks.

5.2 Executive Leadership Team

The Executive Leadership Team is responsible for:

- Reviewing modern slavery risks.
- Monitoring the effectiveness of controls.
- Supporting continual improvement.
- Reviewing performance information and trends.

5.3 Director of Business Support & ESG

The Director of Business Support & ESG is responsible for:

- Maintaining this policy.
- Coordinating annual policy reviews.
- Coordinating the preparation of the Annual Modern Slavery Statement.
- Monitoring legislative developments and best practice guidance.
- Supporting awareness and continual improvement initiatives.

5.4 Human Resources

Human Resources is responsible for:

- Verifying employee identity and Right to Work documentation.
- Ensuring recruitment practices remain lawful and ethical.
- Delivering induction training and awareness programmes.
- Supporting employee welfare.
- Managing concerns relating to worker exploitation.

5.5 Commercial and Procurement Teams

Commercial and Procurement personnel are responsible for:

- Conducting supplier due diligence.
- Assessing supplier compliance.
- Monitoring supplier performance.
- Escalating concerns relating to modern slavery risks.
- Ensuring appropriate supplier approval processes are followed.

5.6 Managers and Supervisors

Managers and supervisors are responsible for:

- Remaining vigilant to signs of exploitation.
- Supporting worker welfare.
- Escalating concerns promptly.
- Ensuring personnel understand reporting arrangements.

5.7 Employees and Workers

All employees and workers are responsible for:

- Complying with this policy.
- Remaining alert to indicators of modern slavery.
- Reporting concerns immediately.
- Cooperating with investigations.

5.8 Suppliers and Subcontractors

Suppliers and subcontractors are expected to:

- Comply with all applicable legislation.
- Prevent modern slavery within their own operations and supply chains.
- Cooperate with Browne's due diligence activities.
- Notify Browne of any actual or suspected modern slavery concerns.

6. Due Diligence Arrangements

Browne applies risk based due diligence processes designed to identify, assess and mitigate modern slavery risks within its business and supply chain.

6.1 Employee Recruitment

Browne will:

- Verify employee identity.
- Conduct Right to Work checks in accordance with UK legal requirements.
- Issue appropriate employment documentation.
- Pay employees directly into their nominated bank account.
- Monitor recruitment practices to ensure they remain lawful and ethical.

6.2 Labour Providers and Recruitment Agencies

Prior to engagement, labour providers and recruitment agencies will be required to demonstrate:

- Compliance with employment legislation.
- Ethical recruitment practices.
- Right to Work verification arrangements.
- Commitment to preventing modern slavery.

6.3 Supplier and Subcontractor Approval

Before approval, suppliers and subcontractors will be required to provide evidence of:

- Compliance with the Modern Slavery Act 2015.
- Appropriate employment practices.
- Anti-bribery and corruption controls.
- Health and safety management arrangements.
- Equality and diversity compliance.
- Appropriate insurance arrangements.
- Their own Modern Slavery Statement where applicable.

6.4 Ongoing Monitoring

Browne may monitor suppliers and subcontractors through:

- Supplier approval processes.
- Prequalification questionnaires.
- Supplier reviews.
- Performance reviews.
- Site monitoring activities.
- Audit and assurance activities.
- Corrective action processes.

6.5 Employee Welfare and Fair Pay

Browne recognises that fair employment practices reduce the risk of exploitation and vulnerability.

Browne is committed to paying employees at least the Real Living Wage and maintaining employment practices that support worker welfare, dignity and respect.

7. Risk Assessment

Browne recognises that modern slavery risks may arise in both direct operations and supply chains. Browne will review modern slavery risk periodically and when significant changes occur in the business, supply chain, operating model, legislation or customer requirements.

Risk Area	Potential Risk	Browne Control
Labour agencies	Worker exploitation, unlawful deductions, withholding wages, recruitment fees.	Agency approval checks, right to work expectations, monitoring and escalation.
Labour only suppliers	Reduced direct oversight of employment practices.	Supplier approval, site monitoring, worker welfare escalation and contract management.
Temporary and migrant labour	Increased vulnerability to coercion, deception or dependency.	Right to work checks, induction, welfare awareness and reporting routes.
Subcontracting arrangements	Limited visibility of lower tier labour arrangements.	Supplier assessment, subcontractor controls and escalation of concerns.
Material supply chains	Reduced visibility of upstream production practices.	Risk based supplier due diligence and supplier declarations.

8. Training and Awareness

Browne is committed to ensuring employees understand modern slavery risks and their role in preventing, detecting and reporting concerns.

Training and awareness arrangements include:

- Modern slavery awareness training for all new starters as part of the induction process.
- Mandatory annual e-learning training for all employees covering:
 - What modern slavery and human trafficking are.
 - Modern slavery risks within business operations and supply chains.
 - Individual responsibilities for preventing, detecting and reporting concerns.
 - Reporting arrangements and escalation routes.
 - Access to Browne's independent confidential reporting service operated by Safecall.
- Modern slavery toolbox talks and project briefings delivered across projects and operational teams.
- Awareness of warning signs and indicators of exploitation.
- Refresher communications and awareness campaigns as required.
- Enhanced awareness for managers, procurement personnel and those involved in supplier engagement.

9. Reporting Concerns and Whistleblowing

9.1 Reporting Concerns

All employees, workers, suppliers and subcontractors are encouraged to report concerns relating to:

- Modern slavery.
- Human trafficking.
- Labour exploitation.
- Unethical recruitment practices.
- Worker welfare concerns.

A concern does not need to be proven before it is reported.

9.2 Reporting Routes

Concerns may be raised through:

Immediate Line Manager

The individual's supervisor or line manager.

Department Management

Department Manager, Head of Department or Director.

Human Resources

Concerns relating to worker welfare, labour providers or recruitment practices.

Independent Confidential Reporting Service

Individuals may raise concerns confidentially through Browne's independent whistleblowing service operated by Safecall.

Access details for Safecall are made available through:

- Employee induction.
- Mandatory annual training.
- Company notices and communications.
- The Whistleblowing Procedure.
- Intranet and business management systems.

9.3 Protection of Whistleblowers

Browne is committed to ensuring that any individual who raises a genuine concern is treated fairly and protected from retaliation.

Browne will:

- Treat reports seriously.
- Investigate concerns appropriately.
- Maintain confidentiality where reasonably practicable.
- Respect requests for anonymity where possible.
- Protect individuals who raise concerns in good faith.
- Support individuals involved in investigations.

This protection applies to employees, agency workers, temporary workers, labour-only personnel, subcontractors, suppliers, consultants and any individual raising concerns relating to Browne's operations or supply chains.

No individual will suffer:

- Dismissal.
- Demotion.
- Victimisation.
- Harassment.
- Bullying.
- Loss of opportunity.
- Discrimination.
- Any other detrimental treatment

for raising a concern in good faith, even if subsequent investigations determine that no wrongdoing has occurred.

Any person who retaliates against an individual for raising a concern may be subject to disciplinary action, contractual sanctions or termination of the business relationship.

9.4 Confidentiality and Anonymous Reporting

Reports may be made on a named or anonymous basis through the Safecall reporting service.

Information relating to concerns will only be shared with those who have a legitimate need to know for the purposes of assessing, investigating or responding to the matter.

9.5 Escalation of Unresolved Concerns

Where an individual believes that:

- A concern has not been adequately investigated;
- Appropriate action has not been taken;
- A concern has been dismissed without reasonable justification; or
- They are dissatisfied with the handling of a concern;

the matter may be escalated through the following levels:

Escalation Level	Escalation Route
Level 1	Immediate Line Manager
Level 2	Department Manager or Head of Department
Level 3	Human Resources or Director of Business Support & ESG
Level 4	Executive Leadership Team Member or Managing Director
Level 5	Safecall Independent Reporting Service

Individuals may use Safecall at any stage if they are uncomfortable using internal routes.

External Reporting

Nothing within this policy prevents individuals from reporting concerns externally where appropriate.

Concerns may be reported to relevant authorities including:

- The Police.
- The Modern Slavery & Exploitation Helpline.
- The Gangmasters and Labour Abuse Authority (GLAA).
- Local Authority Safeguarding Teams.
- Other relevant regulatory or enforcement bodies.

Review of Escalated Concerns

Escalated concerns shall be reviewed by an appropriately senior individual who has not previously been involved in the matter, where reasonably practicable.

The review may result in:

- Further investigation.
- Corrective actions.
- Additional monitoring.
- Supplier review.
- Contractual action.
- External notification.
- Lessons learned and improvement actions.

10. Monitoring and Effectiveness

Browne will periodically review the effectiveness of its modern slavery controls through monitoring and performance measures which may include:

- Induction training completion.
- Annual e-learning completion rates.
- Toolbox talk delivery.
- Supplier due diligence activities.
- Supplier assessment outcomes.
- Reported concerns.
- Investigation outcomes.
- Corrective actions.
- Audit findings.
- Lessons learned.

Relevant performance information shall be used to support the preparation of the Annual Modern Slavery Statement.

11. Breach of Policy

Any employee who breaches this policy may be subject to disciplinary action.

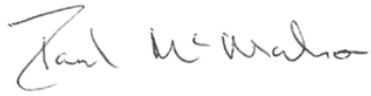
Browne may terminate relationships with suppliers, subcontractors or other third parties who fail to comply with this policy or who are found to be involved in modern slavery, human trafficking or labour exploitation.

12. Review

This policy shall be reviewed annually by the Director of Business Support & ESG and approved by the Managing Director.

Additional reviews shall be undertaken where there are significant changes to:

- Legislation.
- Business activities.
- Supply chain arrangements.
- Organisational structure.
- Customer requirements.
- Identified modern slavery risks.
- Lessons learned from incidents or investigations.



Paul McMahon - Managing Director

Date Approved: 30th July 2026

Next Review Date (on or by): 31st March 2027