

Modern Slavery & Human Trafficking Policy

Introduction

This statement is made pursuant to s54 of the Modern Slavery Act 2015 and sets out the steps that the Brookgate Group has taken and is continuing to take to prevent modern slavery or human trafficking from taking place within our business or supply chain.

Modern slavery is a crime and a violation of fundamental human rights and a hidden blight in our global society. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking; all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Brookgate Group Limited has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere within our own business or in any of our supply chains.

We are committed to ensuring that there is transparency in our own business and in our approach to modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. The Brookgate Group acknowledges its duties and responsibilities under this act.

The Brookgate Group values require that all workers are treated with dignity and respect. We are fundamentally opposed to slavery, human trafficking, forced labour, debt bondage, the sale or exploitation of children and all exploitative practices in the workplace.

We expect the same high standards from all of our contractors, suppliers and other business partners and we expect that our suppliers will hold their own suppliers to the same high standard.

The Brookgate Group has a zero-tolerance attitude to any breach of this legislation and will terminate business relations with any contractor or supplier found to be in breach of anti-slavery or human trafficking obligations.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners.

This statement is made by Brookgate Limited on its own behalf and on behalf of the other companies within the Brookgate Group.

Our statement sets out the approach that the Brookgate Group Limited is taking to prevent modern slavery and human trafficking in its business and supply chains.

Processes to Combat, Identify and Mitigate the Risk of Trafficking and Slavery

We are committed to providing a great place to work and this is at the heart of our business strategy.

The construction industry attracts a workforce from all backgrounds. In the UK, we are able to utilise the skills of employees from across the world. Whilst the benefit of this influx of workers allows for a competitive market, it also has the risk of potential exploitation. By checking our employees' NI Numbers or Working Visa's we know that they are legally eligible to work in the UK and that their salary will be monitored by HMRC.

We are committed to providing our employees with a salary that meets the National Living Wage. We also offer at least the required statutory leave entitlement. The former is audited monthly through the payroll process and procedures and the latter by independent review of the employment contract and related documentation coupled with the payroll audit. Furthermore, we ensure all our employees have provided their National Insurance Number, and Working Visa if applicable, prior to their employment and perform the necessary checks to determine their eligibility to work in the UK.

All our employees are:

- Paid by bank transfer, we do not allow payment to be made into third party bank accounts, thus minimising the risk of forced or compulsory labour, and
- Vetted for the right to work in the country where they are employed. Where employees require a work permit/VISA we ensure that the necessary documentation is in place.

As a responsible employer, we take the welfare of our employees seriously. Our Whistleblowing Policy encourages employees to report wrongdoing (including exploitation) in any form.

Training and Awareness

An update on modern slavery and human trafficking and the various issues of which to be aware is included as a specific training module for ALL The Brookgate Group employees. Employees are required to complete the training module every three years. New employees have a 21-day window from the commencement of their employment to complete the training module. This course covers the requirements of the Act, The Brookgate Group's obligations, our supply chain expectations, and the potential consequences for non-compliance.

Ensuring Standards in our Supply Chain

The Brookgate Group business model means that we work in partnership with a large number of sub-contractors and suppliers to fulfil our commercial and contractual obligations to our customers. In common with many companies operating within the

construction industry, our supply chain is complex; there are often many tiers of suppliers between the main contractor and the sources of raw materials and labour they use.

The Brookgate Group are adopting various procedures to ensure that both our existing and potential supply partners understand our values, standards and requirements regarding the prevention of modern slavery and human trafficking within supply chains. The Brookgate Group requires that all suppliers and sub-contractors comply with our online pre-qualification system which incorporates information to ensure that we are confident that our supply chain upholds the same standards, principals and business ethics that we do. The pre-qualification system requires that contractors positively comply with the Modern Slavery Act 2015 and confirm their compliance with our own requirements.

Any new contracts entered into for suppliers outside of this system will be similarly vetted and scrutinised. Contracts will not be entered into or renewed if we feel the supplier does not reach our standards or has progressively allowed their standards to lower.

On - Going Review

We will continue to review and evolve our anti-slavery and human trafficking policy and procedure over time, as we gradually make progress in the adoption of a common approach throughout our business. The Brookgate Group will know the effectiveness of the steps we have taken to ensure that slavery and/or human trafficking is not taking place within our business if no reports are received from employees, the public or law enforcement agencies to indicate that modern slavery practices have been identified.

Failure to comply

Failure to comply with the Act, and/or this policy will be deemed a material breach of the terms of our standard commercial agreements and contracts of employment.

For and on behalf of Brookgate Limited and Group Companies

Jon Wooles, Finance Director