

## MODERN SLAVERY AND FORCED LABOUR STATEMENT FOR FINANCIAL YEAR ENDED 31ST MARCH 2025

### Transparency in Supply Chains (TISC)

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Breheny Group Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Breheny has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

#### Our business

Formed in 1963, we are a privately run family business, which has grown to provide civil engineering services to almost two thirds of the country from our offices in Suffolk, Cambridgeshire, Kent, Lincolnshire, Oxfordshire and Yorkshire.

Our projects range from infrastructure, groundworks, highways & bridges, rail, river and marine defence, environmental, utilities and energy works for a client base including house developers, commercial industries, major retailers, government authorities and local councils. Our quality of works and value for money is substantiated through repeat business and long-term relationships.

#### Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Equal Opportunity and Diversity Policy
- Corporate Social Responsibility Policy

#### Our suppliers

We have zero tolerance to slavery and human trafficking and we expect all of our subcontractors, suppliers and consultants to adhere to our commitment. Breheny operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. Our Subcontractors are responsible for compliance with their supplier relationships.

Our sub-contract conditions have been updated to include a clause to terminate the sub-contractors employment with immediate effect for any contravention of the Modern Slavery Act by them or their

supply chain.

### Risk Assessment and Due Diligence Processes

Prior to taking on a new member of staff we ensure that we complete the necessary pre-employment checks to verify the workers' identity and eligibility to work in the UK. We would not employ those who are unable to provide us with such evidence. The recruitment agencies we use are required to make the same checks before supplying a worker to us.

All our employees are paid by bank transfer and we don't make payments into third party bank accounts thus minimising the risk of forced or compulsory labour.

If we became aware of any potential issue with our staff, agency workers or sub-contractors we would investigate and if our concerns were founded immediately report to the police on 101. If a person was in danger then we would immediately ring 999.

### Training

Our existing employees are made aware of the importance of ensuring that the Company is alert to the potential of slavery and human trafficking via this statement being issued and highlighted within the Employee Documentation System. All new employees will be made aware during their Company Induction.

### Our performance

There were no reported instances of slavery and human trafficking relating to our Company or immediate supply chain within this period. We will continually enhance the effectiveness of our slavery and human trafficking due diligence processes.

We are currently reviewing our internal processes to understand what further steps can be taken to ensure that our obligations under the Act are met and that our Anti-Slavery Policy is effectively implemented and complied with, so as to ensure that there is not slavery or human trafficking in any part of our business.

### Approval for this statement

This statement was approved by the Board of Directors

A handwritten signature in blue ink that reads "J.N.E. Breheny".

Signed by:  
John Breheny  
Chairman

April 2025