

Annual Modern Slavery Statement

Reporting Period: 01st October 2024 to 30th September 2025

1. Introduction

This Modern Slavery Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by the Browne Group during the financial year 01st October 2024 to 30th September 2025 to prevent modern slavery and human trafficking in its business and supply chains. The statement addresses the areas recommended under Section 54, including organisational structure, policies, due diligence processes, risk assessment, effectiveness measures and training.

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 and human trafficking and expect the same commitment from all organisations and individuals with whom we do business.

2. Organisation Structure, Business and Supply Chains

The scope of this statement covers 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

Browne is a civil engineering and infrastructure contractor operating primarily within the UK water sector. Our activities are supported by a diverse supply chain comprising subcontractors, labour providers, labour only suppliers, plant hire companies, material suppliers, professional service providers, consultants, logistics providers and transport companies.

We recognise that modern slavery risks may arise both within our own operations and within the wider supply chains supporting our projects and business activities.

3. Policies Relating to Modern Slavery and Human Trafficking

Browne's commitment to preventing modern slavery is supported by a framework of policies and procedures, including:

- Modern Slavery & Human Trafficking Policy
- Business Conduct Procedure
- Whistleblowing Procedure
- Equal Opportunities Policy
- Recruitment and Selection Procedure
- Supplier Approval and Procurement Procedures

- Anti-Bribery and Corruption Policy
- Health, Safety and Wellbeing Policies

These documents establish expectations for ethical behaviour, worker welfare, lawful recruitment and responsible supply chain management.

4. Due Diligence Processes

Browne operates risk based due diligence processes designed to identify, prevent and mitigate modern slavery risks.

4.1 Recruitment and Employment

To reduce the risk of labour exploitation within our workforce, Browne applies a range of employment controls, including:

- Verification of employee identity.
- Right to Work checks in accordance with UK legislation.
- Direct employment arrangements and lawful payment processes.
- Monitoring of recruitment practices.
- Engagement with reputable recruitment and labour providers.

4.2 Labour Providers and Agencies

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

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

4.3 Suppliers and Subcontractors

As part of our supplier approval and monitoring processes, suppliers and subcontractors may be required to provide evidence relating to:

- Modern Slavery Act compliance.
- Employment practices.
- Health and safety arrangements.
- Equality and diversity compliance.
- Anti-bribery and corruption controls.
- Appropriate insurance arrangements.

Where appropriate, suppliers may also be requested to provide their own Modern Slavery Statement.

4.4 Ongoing Monitoring

Browne monitors supplier performance through a combination of supplier approval processes, contract management activities, site monitoring, supplier reviews and performance assessments. Concerns identified through these activities are investigated and managed appropriately.

4.5 Employee Welfare and Fair Employment

Browne recognises that fair employment practices contribute to reducing the risk of worker exploitation and vulnerability.

During the reporting period, Browne maintained its commitment as a Real Living Wage Employer and continued to pay employees at least the Real Living Wage.

Browne believes that fair pay, lawful recruitment practices, worker welfare arrangements and access to confidential reporting mechanisms are important measures in helping to prevent modern slavery and labour exploitation.

5. Risk Assessment and Management

Browne recognises that certain areas of its business and supply chain present a greater potential risk of modern slavery than others.

The principal risk areas identified during the reporting period included:

Risk Area	Key Risk	Risk Management Measures
Labour agencies and recruitment providers	Worker exploitation, unlawful deductions or recruitment fees	Agency assessment and supplier approval processes
Labour only suppliers	Reduced visibility of worker employment arrangements	Due diligence and site monitoring
Temporary and migrant labour	Increased vulnerability to coercion or exploitation	Right to Work checks, inductions and management oversight
Subcontracting arrangements	Reduced visibility of lower tier supply chains	Subcontractor approval and contract management
Material and product supply chains	Potential upstream labour exploitation risks	Supplier assessment and monitoring

Browne continues to review modern slavery risks and update its controls where changes in business activities or supply chain arrangements are identified.

6. Effectiveness and Performance Indicators

Browne monitors the effectiveness of its approach to preventing modern slavery through a range of measures and management controls.

Performance indicators reviewed include:

- Employee modern slavery training completion rates.
- Supplier due diligence activities.
- Supplier approval assessments.
- Reported concerns and investigations.
- Corrective actions raised and completed.
- Supplier audit findings and compliance outcomes.

During the reporting period, Browne did not identify any substantiated incidents of modern slavery within its direct operations.

The Group continues to develop its monitoring and reporting arrangements to strengthen visibility of supply chain risks and demonstrate ongoing improvement.

7. Training and Capacity Building

During the reporting period, Browne continued to provide modern slavery awareness training to employees and workers.

All new starters received modern slavery awareness information as part of the employee induction process.

Existing employees were required to complete annual mandatory e-learning training covering:

- The definition of modern slavery and human trafficking.
- The risks associated with modern slavery.
- Individual responsibilities for preventing, detecting and reporting concerns.
- The processes available for reporting concerns through management channels or Browne's independent confidential reporting service operated by Safecall.

To reinforce awareness at operational level, Browne also delivered toolbox talks and project briefings covering:

- Indicators and warning signs of modern slavery.
- Worker exploitation risks within the construction sector.
- How concerns can be reported and escalated.

These arrangements form part of Browne's commitment to ensuring employees understand modern slavery risks and are able to identify and report concerns appropriately.

8. Reporting Concerns

Employees, agency workers, subcontractors, suppliers and other stakeholders are encouraged to report concerns relating to modern slavery, human trafficking or worker exploitation.

Concerns may be raised through:

- Line Management.
- Human Resources.
- Senior Management.
- Browne's Whistleblowing Procedure.
- Browne's independent confidential reporting service operated by Safecall.

All concerns are treated seriously and investigated appropriately.

Browne will not tolerate retaliation against any person who raises a concern in good faith.

9. Continuous Improvement

Browne is committed to continually strengthening its approach to preventing modern slavery and human trafficking.

Future improvement activities include:

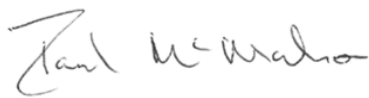
- Ongoing review of supplier due diligence arrangements.
- Enhancement of supply chain monitoring processes.
- Continued development of employee awareness and training.
- Annual review of modern slavery risks.

- Improvement of performance measurement and reporting arrangements.
- Regular review of policies and procedures supporting modern slavery prevention.

10. Approval and Publication

This statement has been approved by the Board of Directors of the Browne Group and constitutes Browne's Modern Slavery Statement for the financial year **01st October 2024 to 30th September 2025**. It will be published on the Browne website in accordance with Section 54 of the Modern Slavery Act 2015.

Date Published: February 2026



Paul McMahon

Managing Director

For and on behalf of the Browne Group