



Modern Slavery Act Transparency Statement

On behalf of Breyer Holdings Limited and Breyer Group Plc

It continues to be a priority for Breyer Group to trade ethically, source responsibly and prevent modern slavery and human trafficking throughout our organisation, including our supply chain.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Breyer Group has undertaken during this financial year, and is continuing to take, to ensure that modern slavery and human trafficking are not taking place within our business or supply chain including sub- contractors and suppliers.

Breyer Group acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to Breyer Group. These, as well as the suppliers of services, make up the supply chain with Breyer Group.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Breyer Group 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.



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OUR HIGH-RISK AREAS

We acknowledge that risks arising from modern slavery and human trafficking can apply anywhere within our operations and supply chain, whether through the supply of materials, direct employment or sub-contracted employees.

We feel there is a particular risk in recruitment when using agencies and have therefore set up a preferred supplier list ensuring everybody within the business uses agencies that are approved and added to our Preferred Supplier list. As per our main supply chain companies, all agencies undergo a strict vetting process before providing staff for work on our construction sites. All agencies sign up to eradicate modern slavery and human trafficking within their business and acknowledge and sign up to our code of principles thereby agreeing to pay their operatives/management staff at least the national minimum wage / national living wage. We expect our suppliers and subcontractors to ensure there is no slavery or human trafficking in their supply chains.

We also acknowledge Brexit has changed our immigration system and we are mindful of the changes this may bring for migrants already trafficked into the UK or exploited for their labour. As legal migration routes close and UK businesses suffer from vast workforce shortages in the face of diluted access to talent pools, we anticipate the need to continue to develop our recruitment strategies and to have contingency plans and strategies to counter current unpredictable times. We acknowledge the need to be extra vigilant to ensure there is no exploitative labour throughout our supply chains. So, we will need to continually assess the impact of any future changes to immigration law and policy that may in turn affect changes to our working practices, in order to continue to tackle and eradicate modern slavery and human trafficking.

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We ask all our suppliers to confirm that they have read and understood the expectations contained within our code of conduct set out below:

INTRODUCTION - The Modern Slavery Act 2015

It is well recognised that slavery still exists and that some of the most vulnerable people in society continue to be ruthlessly exploited for criminal gain. The Government introduced legislation with a view to stamping out modern slavery. The Modern Slavery Act 2015 received royal assent in March 2015. Its principal purpose is to consolidate existing legislation regarding criminal offences relating to slavery, including human trafficking, forced labour and other forms of exploitation. The Act is designed to provide law enforcement agencies with stronger methods to tackle modern slavery and enhance protection for its victims.

Breyer Group recognises that being responsible and sustainable really matters to us. We are dedicated to making sure everything we do is ethical and lawful, and that we work in a socially and environmentally sustainable way.

It is important that our suppliers feel the same way, and that is why we have put together this code of conduct to give you a good idea of what it means to work with Breyer Group.

Our code is a set of principles that we expect all suppliers to work within. We will be working with our suppliers to make sure they have the right policies and processes in place to comply with these principles, and that they also use them with their own suppliers. We will also consider these principles when we are choosing suppliers, and we will be working together to monitor compliance throughout our relationship.

A lot of the principles in this code are about complying with laws and regulations. By this, we mean laws and regulations that apply in the jurisdiction that suppliers operate in. At Breyer Group, this compliance is the minimum standard we are looking for, and we are always working with our suppliers to improve things further.

Wherever we are working regularly with suppliers, we will do everything we can to make sure processes are in place to check that our principles are being followed and continually reviewed and that there are solutions available for anything that needs to be put right. We will do this through our contracts with suppliers, and we might use independent third parties to check that our suppliers are complying with our principles.

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OUR PRINCIPLES – *The principles in this code are not meant to provide an exhaustive list of expectations of suppliers, just things that matter most. These are our priorities:*

HUMAN RIGHTS AND LABOUR CONDITIONS

Freedom of Employment

Employees should be free to choose to work for their employer and to leave the company after they have given reasonable notice.

Employment Relationships

Employees should have an easy-to-read contract of employment, which needs to comply with legislation and be particularly clear about wages. Employees who are unable to read the contract should be introduced to a suitable person, who can read and explain the contract to them.

Freedom of Association

Employees should be free to join trade unions (or other kinds of representation) and, where appropriate, to carry out representative functions at work, in accordance with relevant legislation. Employees should not be discriminated against, or be treated unfavourably or differently, because they carry out representative functions.

Wages

Wages and benefits need to be in accordance with the relevant legislation. Employees should give their informed, freely given consent to any deductions (which should also be lawful).

Child Labour

Breyer Group does not support the use of child labour in any circumstances.

Where children under the age of 18 are legally employed, they must not be employed at night or in hazardous conditions. All suppliers must work towards elimination of child labour and this should be in a manner consistent with the best interests of the children concerned.

Working Hours

Suppliers should comply with legislation and/ or industry standards on working hours, giving employees days off and resting times accordingly. Suppliers must not make workers engage in work over 48 hours in any given week unless the worker provides consent in line with the working time regulation. Workers shall also be provided with at least one day off in every seven days.

Overtime should be voluntary and not demanded on a regular basis. Employees working overtime should be reimbursed at an appropriate rate.

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Treating Employees Equally with Respect and Dignity

Employees should never be abused, harassed or intimidated, and any disciplinary measures taken should be recorded. Employees should have access to a written grievance or appeal procedure that is clear and easy to understand. Employees who are unable to read the procedure should be introduced to a suitable person, who can read and explain it to them.

Health and Safety

Suppliers will provide their employees with a safe and healthy workplace and should make sure a senior management representative is responsible for Health and Safety, and that appropriate policies and procedures are in place.

Discrimination

Suppliers should not discriminate in hiring and employing workers on the basis of race, caste, birth, social or ethnic origin, religion or belief, nationality, age, gender, gender identity or expression, marriage and civil partnership, sexual orientation, disability, pregnancy and maternity, union membership or political affiliation.

The Environment

Suppliers should try and minimise any potential impact on the environment when supplying goods and services to us. As a minimum, we expect suppliers to comply with all local and national environmental legislation, regulations and directives to protect and improve the environment, and have developed; reviewed and recorded processes in place to make sure they comply.

We also expect suppliers to have action plans in place to manage their environmental impact, e.g. energy reduction and waste management programmes. Where appropriate, suppliers must also comply with additional environmental requirements specific to the products and services supplied to Breyer Group. Any specific requirements would be outlined in the contract.

Business Ethics

Suppliers should uphold the highest standards of integrity, transparency and governance, and, as a minimum, we expect our suppliers to comply with all relevant legislation and regulations. Suppliers must not take part in forms of bribery or corruption, and must not knowingly be associated with any group that supports acts of violence, terrorism or discrimination.

Our Supplier Engagement Process

We expect openness and transparency in our relationships with our suppliers. We want to work together to improve our sustainability performance, and we will endeavour to support continuous improvement with any supplier that needs help meeting the principles of this code. Transparency includes maintaining documentation necessary to demonstrate compliance with those principles including ensuring compliancy with all 'right to work' documentation. Breyer Group may exercise its relevant contractual rights to access documentation and raise reasonable enquiries.

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RELEVANT POLICIES

We have the following policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. These describe our approach to the identification of modern slavery and human trafficking risks and steps to be taken to prevent slavery and human trafficking in our operations. We also make sure that our suppliers are aware of our policies and adhere to the same high standards. These include:

1. Anti-slavery Policy. This policy sets out the organisation's stance on modern slavery and sets out our code being a set of principles that we expect anyone working for and on our behalf as well as all our suppliers to work with.
2. 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. Our payroll check ensures that no employees are paying their salary into the same bank account as another employee unless both parties are proven account holders on a joint bank account.
3. 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. It provides a mechanism for both our employees and others working in our supply chain to report suspected issues.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act. We are committed to acting ethically and with integrity in our business dealings and relationships and expect the same from others.
5. Supplier/Procurement code of conduct. The organisation is committed to ensuring its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in the use of their labour. The organisation works with suppliers to ensure that they meet standards of the code and improve their worker's conditions. All our suppliers have to sign to say they acknowledge and understand the expectations within our code and we will work with them to develop and maintain systems and controls designed to ensure modern slavery and human trafficking are not taking place anywhere across our business or across our supply chain.

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OTHER SUPPLIERS

We operate a supplier policy and maintain a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. As part of our due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

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. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery and human trafficking within their business.
2. They hold their own suppliers to account over modern slavery and human trafficking.
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.
5. We may terminate the contract at any time should any instances of modern slavery and/or human trafficking come to light.

COMMUNICATION AND TRAINING

We provide training and regularly communicate to our procurement/buying teams so that they understand the signs of modern slavery and human trafficking and what to do if they suspect that it is taking place within our supply chain. Our procurement teams play an important role in ensuring that our suppliers participate in, and comply with, our on-going assessment programme.

To create an internal awareness across our business our Health and Safety team send out bulletins across the business and place posters around our sites to reinforce our zero-tolerance approach to modern slavery and human trafficking.

In addition to any reports received from employees, the public, or law enforcement agencies to indicate that modern slavery or human trafficking practices have been identified, we will continue to monitor the effectiveness of our actions against modern slavery and human trafficking to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chain.



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Approval for this statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement and was approved by the Board of Directors on 1st November 2023.

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