

SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) and sets out the steps that the Charles Brand Group of Companies 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.

The Act requires certain businesses to provide disclosure concerning their efforts to address the prevention of slavery and human trafficking in their supply chains. These disclosures are intended to provide clients the ability to make better informed decisions about the services they buy and companies they support.

OUR GROUP STRUCTURE

Charles Brand Group Limited is part of the Lagan Specialist Contracting Group which is a private family-owned construction and civil engineering business which provide specialist contracting and services solutions throughout the UK, Ireland and overseas.

The Charles Brand Group of Companies (including Charles Brand Limited and Lagan Construction Limited) is committed to fully supporting the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. We are committed to social and environmental sustainability and have a zero tolerance for slavery and human trafficking. We do not support or engage with any business knowingly involved in such activities. 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 modern slavery is not taking place anywhere in our own business or in any of our supply chains. Charles Brand Group of Companies will ensure transparency within the organisation and with subcontractors and suppliers of goods and services in order to prevent slavery and human trafficking throughout the supply chain.

As an equal opportunities’ employer, we’re committed to creating and ensuring a non-discriminatory and respectful working environment for our employees.

OUR POLICY ON ANTI-SLAVERY AND HUMAN TRAFFICKING

Our Anti-Slavery and Human Trafficking Policy reflects a long-standing commitment to acting ethically and with integrity in all our business relationships, supported by the development and implementation of effective systems and controls.

We recognise that slavery and human trafficking can occur in many forms. Therefore, throughout this document we use the terms “slavery and human trafficking” to encompass various forms of coerced labour. We believe that working in partnership with our clients, community stakeholders and supply chain in a sustainable way enables us to find practical, safer methods of ethical trading free from slavery and human trafficking.

In addition to the Anti-slavery and Human Trafficking Policy, we have several internal policies to ensure that we are conducting business in an ethical and transparent manner:

- Anti-Bribery and Corruption Policy

| | | | | | |
|------------------|-----------------------|-----------------|-----------------|-------------|------------|
| Ref No: | 1-FKL-HSAF-POL009 | Issue No: | 1.0 | Issue Date: | 13/09/2021 |
| Functional Owner | <i>Alasdair Revie</i> | Document Owner: | <i>N McGill</i> | Page: | 1 of 2 |

- Recruitment and Selection Policy
- Whistleblowing Policy
- Code of Conduct

OUR ANTI-SLAVERY AND HUMAN TRAFFICKING ASSURANCE PROCESS

As part of an initiative to identify and mitigate risk in respect of slavery and human trafficking, we have:

- Developed and agreed our Anti-Slavery and Human Trafficking Policy Statement.
- Conducted due diligence on suppliers and subcontractors to confirm their compliance with the Modern Slavery Act. Suppliers and subcontractors are contractually required to comply with the Modern Slavery Act.
- Reviewed our recruitment processes to ensure they continue to be both transparent and thorough. We have robust procedures in place for vetting new employees and ensuring we are able to accurately confirm their identities. A risk that was identified was within the recruitment processes for agency labour.
- Ensure that all staff have a written contract of employment.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and in our business, we will provide training to our staff that is proportionate to the level of risk.

They will be informed of the appropriate action to take if they suspect a case of slavery or human trafficking. This training includes:

- Introduction to modern slavery
- Human Trafficking
- Labour exploitation
- Hidden Slavery
- Legislation
- Warning signs
- Good business practices

DEVELOPING FOR THE FUTURE

As our approach to slavery and human trafficking develops, we will assess how well we are doing and whether additional procedures may be necessary. We are committed to reporting publicly about our performance each year.

This statement has been reviewed by our Managing Director and is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Charles Brand Group Limited, Charles Brand Limited and Lagan Construction Limited for the financial year ending 31 March 2022

Managing Director



Niall McGill

| | | | | | |
|------------------|-------------------|-----------------|----------|-------------|------------|
| Ref No: | 1-FKL-HSAF-POL009 | Issue No: | 1.0 | Issue Date: | 13/09/2021 |
| Functional Owner | Alasdair Revie | Document Owner: | N McGill | Page: | 2 of 2 |