

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

With a turnover of less than £36m, pursuant to section 54(1) 'Transparency in Supply chains' Connell Brothers Limited (the Company) does not have a legal obligation to provide a slavery and human trafficking statement for each financial year; however, to be transparent about what is happening within our business the Company have issued a Modern Slavery Act Transparency Statement which makes clear our stance.

A copy of this Statement will be provided to any interested parties, including Clients and other stakeholders, upon request and will be reviewed annually by the QHSE Director in association with designated personnel, sooner if changes in legislation dictate.

Introduction

Slavery and human trafficking is a worldwide reality and an abomination in this modern age; the Company takes a robust approach and is committed to preventing slavery and human trafficking in its work activities, and to ensuring that its supply chains are free from slavery and human trafficking.

We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain; Company personnel are expected to report concerns and the QHSE Director or designated person will act upon them.

This statement sets out the Company's actions to understand all potential modern slavery risks related to our business and to put in place steps aimed at ensuring that there is no slavery or human trafficking in our business and its suppliers/sub-contractors.

This statement covers the activities of the Company; these services are demolition, dismantling, asbestos removal, both licensable and non-licensable and remediation.

Countries of operation and supply chain

The Company currently operates in the United Kingdom and does not undertake work in any other countries.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within its business or the business of its suppliers/sub-contractors.

Supplier/sub-contractor adherence to our values

We have zero tolerance to slavery and human trafficking. We communicate this and expect all those in our supply chain and contractors to comply with our values.

All suppliers and sub-contractors are required to complete a questionnaire to ensure that they meet our standards/requirements e.g. Health & Safety. Equal Opportunities and are free from modern slavery and/or human trafficking etc.

High-risk activities

Recruitment of temporary labour and paying the agency not the employee is potentially open to this risk. The current migrant crisis is of concern, as we know that the illegal immigrants are entering the country and without access to means to support themselves, they may fall foul of gang lords who offer cheap unskilled labour.

Company policy is to recruit and pay staff directly; agency labour is a last resort when all other avenues have been explored and will only be recruited from reputable agencies able to provide satisfactory evidence of their selection and employment processes.

Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows:

- **Policies:** The QHSE Director, in association with the QHSE Advisor, is responsible for implementing and reviewing all Company policies and the processes/statutory requirements by which they were developed.
- **Assessment of risk:** The QHSE Director, in association with the QHSE Advisor, is responsible for assessing risks for all work activities and ensuring that the Company is free from modern slavery and/or human trafficking; in addition, they are also responsible for ensuring that all sub-contractors and suppliers meet our standards and values and that all staff are aware of the problem and what they must do if these standards are not met.

All Company personnel understand their obligation to these requirements in the same way that they understand their obligation to Safety, Health, Environmental and Quality requirements.

- **Material source, services & equipment** – the Company only utilises specified reputable companies to source and supply goods, services and equipment.

Relevant policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

- **Whistleblowing policy** The Company encourages all Company personnel, Clients and any other involved persons to report any concerns related to either Company activities, or those of suppliers/sub-contractors to the Company; this includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Company personnel, Clients or others who have concerns can contact the QHSE Director in a confidential communication.

- **Company personnel** Company requirements, detailed in the Integrated Management System and related Policies/Manuals, makes it clear to all Company personnel the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when carrying out our works and managing suppliers/sub-contractors.
- **Supplier/Procurement code of conduct** The Company is committed to ensuring that its' suppliers/sub-contractors adhere to the highest standards of ethics. Suppliers/sub-contractors are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, act ethically and within the law in their use of labour.

The Company will work with suppliers/sub-contractors to ensure that they meet required standards with regards to all statutory requirements; serious violations of Company/statutory requirements will either lead to the termination of the sub-contract or removal from the Company approved supplier list.

Due diligence

As part of our initiative to identify and mitigate risk:

- We will recruit and pay staff directly; agency personnel will only be used as a last resort, such personnel will be from a reputable agency and checks will be made to determine that the correct monies are being paid to the individuals and that the agency is able to provide satisfactory evidence of their selection and employment processes;
- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour;
- Our point of contact for suppliers/sub-contractors is UK based; we require them to provide evidence of suitable anti-slavery and human trafficking policies and processes.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.
- The Company undertakes due diligence when employing new suppliers/sub-contractors, and regularly reviews its existing suppliers/sub-contractors as appropriate;
- The Company communicate this Policy to all Company personnel and identify the requirements contained therein;

This Policy constitutes the company's human trafficking statement and, alongside all other Company policies, will be reviewed formally at our annual Management Review Meeting.

Eventual responsibility for fulfilling the defined responsibilities and arrangements is vested in the undersigned,

A handwritten signature in blue ink, appearing to read 'Jim Connell'.

Jim Connell
QHSE Director
November 2022