

**MODERN SLAVERY &
HUMAN TRAFFICKING
POLICY
MAY 2026**

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1. POLICY STATEMENT

Brims Construction Ltd is committed to conducting business ethically and responsibly.

We have a zero-tolerance approach to modern slavery, forced labour, servitude, child labour and human trafficking in all areas of our business and supply chain.

We are committed to protecting human rights and ensuring that all individuals working for or with Brims are treated fairly, lawfully and with dignity.

2. SCOPE

This policy applies to:

- Employees.
- Agency workers.
- Subcontractors.
- Labour providers.
- Suppliers.
- Consultants.
- Business partners.

The standards outlined in this policy apply throughout our operations and supply chain.



Jason Wood
Director

Date of last review: 01/05/2026
Date of next review: 01/05/2027

Our Business and Supply Chain

Brims Construction Ltd is a construction company providing construction, maintenance and related services across its areas of operation.

Our workforce consists of directly employed personnel together with the use of agency workers, subcontractors, specialist contractors and labour providers where appropriate.

Our supply chain includes suppliers of construction materials, plant and equipment providers, labour agencies, professional consultants, subcontractors and other business partners that support the delivery of our services.

Brims recognises that the construction industry can present increased risks of labour exploitation due to the use of subcontracted labour and complex supply chains. We are committed to identifying, assessing and reducing these risks through appropriate due diligence, monitoring and supplier engagement.

3. UNDERSTANDING MODERN SLAVERY

Modern slavery is a criminal offence and may take several forms, including:

- Human trafficking.
- Forced or compulsory labour.
- Debt bondage.
- Servitude.
- Child labour.
- Exploitation through coercion or intimidation.

Victims are often unable to leave their situation due to threats, abuse, debt, deception or fear.

4. OUR COMMITMENT

Brims will:

- Comply with the Modern Slavery Act 2015.
- Promote ethical recruitment practices.
- Verify right-to-work requirements.
- Conduct appropriate due diligence on suppliers and subcontractors.
- Monitor modern slavery risks within our operations.
- Raise awareness through training and communication.
- Investigate concerns promptly.

As part of our due diligence process, Brims will undertake risk-based assessments including supplier questionnaires, contractual compliance requirements, right-to-work verification checks, review of labour provider practices and other reasonable measures to identify and mitigate modern slavery risks.

To help identify and manage risks, Brims adopts a risk-based approach to assessing its operations and supply chain. Factors considered include the type of services provided, labour sourcing

arrangements, geographic location, workforce composition and previous compliance performance.

Where higher-risk activities are identified, enhanced due diligence measures may be implemented to ensure compliance with legal and ethical employment standards.

Where appropriate, Brims will cooperate with relevant authorities and enforcement agencies, including the Police, National Crime Agency, Fair Work Agency and other regulatory bodies.

5. EMPLOYEE RESPONSIBILITIES

Employees are expected to:

- Remain alert to potential signs of exploitation.
- Report concerns immediately.
- Follow recruitment and procurement procedures.
- Support ethical employment practices.
- Cooperate with investigations.

Employees involved in recruitment, procurement, supplier management or site supervision will receive appropriate modern slavery awareness training to assist them in recognising and responding to potential risks.

6. WARNING SIGNS

Potential indicators of modern slavery may include:

- Individuals appearing fearful or withdrawn.
- Workers lacking control of identification documents.
- Signs of physical abuse or neglect.
- Poor living conditions.



- Workers being transported together under unusual circumstances.
- Individuals being reluctant to speak independently.
- Excessive working hours with little apparent freedom.

The presence of an indicator does not necessarily mean modern slavery exists, but concerns should always be reported.

7. SUPPLY CHAIN STANDARDS

Brims expects all suppliers, subcontractors and labour providers to:

- Comply with applicable employment legislation.
- Prevent forced labour and exploitation.
- Operate ethical recruitment practices.
- Cooperate with due diligence requests.
- Address any identified concerns promptly.

Suppliers, subcontractors and labour providers may be required to provide information or evidence demonstrating compliance with modern slavery legislation and ethical employment standards. They are expected to cooperate with any reasonable audits, assessments or investigations where concerns have been identified. Failure to meet these standards may result in corrective action or termination of the business relationship.

8. REPORTING CONCERNS

Any suspected instance of modern slavery must be reported immediately to:

- A Line Manager.
- A Director.
- Through the Company's Whistleblowing Procedure.

Reports will be treated seriously and investigated appropriately.

Brims encourages all workers, contractors and business partners to raise concerns in good faith. No individual will suffer retaliation, victimisation or detrimental treatment as a result of reporting a genuine concern regarding suspected modern slavery.

9. BREACHES

Failure to comply with this policy may result in disciplinary action, termination of contracts and referral to the relevant authorities.

10. REVIEW

This policy will be reviewed periodically to ensure continued compliance with legislation and best practice.

The effectiveness of this policy will be monitored through management reviews, supplier assessments, training activities, incident reporting and, where appropriate, audits. Findings from these reviews will be used to strengthen controls and improve our approach to preventing modern slavery.

Training and Awareness

Brims is committed to ensuring that employees understand the risks associated with modern slavery and human trafficking.

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Modern slavery awareness training is provided to employees whose roles involve recruitment, procurement, supplier management, contract management, site supervision and workforce engagement.

Training includes:

- Understanding modern slavery and human trafficking.
- Recognising indicators of exploitation.
- Reporting concerns and escalation procedures.
- Ethical recruitment practices.
- Supply chain risk awareness.
- Responsibilities under the Modern Slavery Act 2015.

Training requirements are reviewed periodically to ensure that employees remain aware of emerging risks and good practice.

11. RESPONSIBILITIES AND MONITORING

The Director has overall responsibility for ensuring this policy is implemented, maintained and periodically reviewed.

Managers are responsible for promoting awareness of this policy and ensuring compliance within their areas of responsibility.

All employees, workers, subcontractors and suppliers are expected to support the principles of this policy and contribute to the prevention, detection and reporting of modern slavery risks.

Brims is committed to continually improving its processes and controls to reduce the risk of modern slavery within its business and supply chain.

12. MEASURING EFFECTIVENESS

Brims is committed to continuously improving its approach to preventing modern slavery and human trafficking.

To assess the effectiveness of this policy and associated controls, Brims may monitor the following key performance indicators:

- Number of modern slavery concerns reported.
- Number of concerns investigated and resolved.
- Completion rates for modern slavery awareness training.
- Supplier due diligence activities completed.
- Supplier compliance issues identified and addressed.
- Audits, inspections or reviews undertaken relating to labour standards.
- Corrective actions implemented following identified concerns.

The results of these measures will be reviewed periodically by management to assess the effectiveness of our efforts in preventing modern slavery within our business and supply chain and to identify opportunities for continual improvement.

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