

Introduction

Benniman Ltd are a building contractor working within the motor retail, commercial, industrial, residential and educational sectors in the UK.

This statement details Benniman Ltd will manage all potential modern slavery risks related to its business and control measures put in place steps to ensure that there is no slavery or human trafficking in its own business and its supply chain. This statement relates to actions and activities during the financial year 2023 – 2024.

The organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking, is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chain is free from slavery and human trafficking.

Organisational structure and supply chains

The company has reviewed the Modern Slavery Act 2015 including the industry guidance and has undertaken a risk assessment of its work process to identify activities that are high risk in relation to slavery or human trafficking. The company has identified the constructions activities that require the use of labour gangs (i.e. ground works, concreting or erection) as high risk by the company. These work activities use labour gangs that could be susceptible to slavery or human trafficking

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

- **Policies:** The Directors and management of Benniman Ltd are responsible for the implementation, monitoring and review of the policy.
- **Risk assessments:** The Directors and management of Benniman Ltd have undertaken a risk assessment of its work activities which is reviewed on an annual basis.
- **Investigations/due diligence:** All subcontractors must complete the Benniman Ltd pre-qualification questionnaire which requires them to confirm arrangements are in place to prevent the employment of illegal workers, slavery or human trafficking.

Where there are suspected cases of slavery or human trafficking the directors are to be informed and an internal investigation undertaken. Advice will be taken from the authorities where cases are found.

Relevant policies

The organisation 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 organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Subcontractors code of conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to confirm in the subcontractors questionnaire that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Any serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship and information passed on to the relevant authorities.

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- **Agency workers policy:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. All agency workers are required to provide evidence they have to right to work in the UK, they have the skills and competence to undertake the job role. This includes details of their experience and references from previous employers.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier.
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- developing a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains, whereby the organisation evaluates all existing suppliers.

Awareness Training

The organisation requires members of the contracts teams to made aware and issued with this policy. The contracts team are to understand:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- the risk of slavery and human trafficking in relation to various aspects of the business;
- if suspected or found the issue is to be escalate to the directors of the company;
- external help is available, for through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- that subcontractors, suppliers and other business partners are aware or anti-slavery policies; and
- the steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

STEVEN SMITH



MANAGING DIRECTOR

Date: 01.04.2026

APPENDIX I

Anti-Slavery and Anti-Trafficking Employment Code

1. Employment is freely chosen

- 1.1. There is no forced, bonded or involuntary prison labour.
- 1.2. Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. Working conditions are safe and hygienic

- 2.1. A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 2.2. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 2.3. Access to clean toilet facilities and to drinkable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 2.4. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 2.5. The company observing the code shall assign responsibility for health and safety to a senior management representative.

3. Child labour shall not be used

- 3.1. There shall be no recruitment of child labour.

4. Living wages are paid

- 4.1. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 4.2. All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 4.3. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

5. Working hours are not excessive.

- 5.1. Working hours must comply with UK Legislation, collective agreements, and the provisions of 5.2 to 5.6 below, whichever affords the greater protection for workers. Sub-clauses 5.2 to 5.6 are based on international labour standards.

- 5.2. Working hours, excluding overtime and shall be defined by contract. Whereas employees waive their rights under Regulation 4(1) of the Working Time Regulations 1998 to a 48-hour limit over a seven day period, hours actually worked will not be excessive (see 5.4 and 5.5 below).
- 5.3. All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment.
- 5.4. The total hours worked in any seven-day period shall not exceed 60 hours, except were covered by clause 5.5 below
- 5.5. Working hours may exceed 60 hours in any seven-day period only in exceptional circumstances where all of the following are met: • appropriate safeguards are taken to protect the workers' health and safety; and • the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 5.6. Workers shall be provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period.

6. No discrimination is practised

- 6.1. There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

7. Regular employment is provided

- 7.1. To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 7.2. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

8. No harsh or inhumane treatment is allowed

- 8.1. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

The above policies have been applied without breach over the course of the last year.

APPENDIX II - BENNIMAN LIMITED

Anti-Slavery and Anti-Trafficking Clause to be inserted into all procurement contracts

The Contractor acknowledges that as an organisation carrying out business in the UK it is required to comply with the Modern Slavery Act 2015. The Contractor warrants that it does so and will take steps to ensure its operations and supply chains are trafficking- and slavery-free, including without limitation imposing substantially similar obligations to those in this clause where it is permitted to subcontract its obligations under this Agreement so that multi-level supply chains are addressed. The Contractor acknowledges and agrees that any breach of this warranty will constitute a material remediable breach of contract.

The Contractor further warrants that neither it nor any of its officers, employees, nor so far as it is aware any subcontractor or other persons associated with it, have been convicted of any offence involving slavery and human trafficking. The Contractor acknowledges and agrees that any breach of this warranty will constitute an irredeemable breach of contract.