

Modern Slavery Statement

Introduction

Modern slavery is a crime and a violation of basic human rights which impacts millions of people worldwide. Modern slavery deprives its victims of their liberty and exploits them for personal or commercial gain.

Section 54 of the Modern Slavery Act 2015 (MSA) requires commercial organisations that supply goods or services, carry on business in the UK and (together with their subsidiaries) meet an annual turnover threshold of £36m or more to publish a modern slavery and human trafficking statement.

This statement is made by Brickability Group PLC on its own behalf and on behalf of all of its subsidiary companies that together form the Brickability Group (the Group).

Organisational structure

The Group operates across four divisions – Bricks and Building Materials, Importing, Distribution and Contracting. The Group employs over 800 staff, all based in the UK, and has an annual turnover of approximately £637 million for the year ended 31 March 2025. The Group pays all employees at least the Real Living Wage and adheres to all relevant UK employment legislation.

The Group's key products include bricks, cladding, roofing, plumbing and heating, and renewable technologies. While our operations are UK-based, we maintain partnerships with manufacturers and suppliers in Europe and other global regions, through which we import specialist products for the UK market. In FY25, sales were split by division as follows:

- **Bricks and Building Materials** – supplying clay and concrete bricks, blocks, roof tiles and other core building products. These products made up 66% of Group revenue.
- **Importing** – specialist imported products, including cladding systems, flooring and tiling. These products made up 8% of Group revenue.
- **Distribution** – plumbing and heating products, as well as renewable technologies such as solar panels and battery storage, supplied through UPOWA and Towelrads. These products made up 11% of Group revenue.
- **Contracting** – cladding installation, roofing services and fire safety remediation projects. These products and services made up 15% of Group revenue.

Our supply chains

Our supply chain is broad and varied. It includes professional services providers, product suppliers, and partners with whom we manufacture selected products such as radiators and renewable technologies. It also encompasses engineering and electrical suppliers, energy suppliers, and logistics services. In addition, our Contracting division delivers cladding, roofing, flooring installation and fire safety remediation projects, which involve subcontractors and self-employed workers that we recognise form part of our supply chain.

We recognise that risks of labour abuse could occur in second- and third-tier suppliers in certain

industries and we continue to develop our risk analysis to understand how this impacts our suppliers.

Most of our suppliers are based in the UK and Europe and are large, reputable companies. The risk of modern slavery is deemed to be low in these jurisdictions. We take steps to ensure that suppliers and other third parties take responsibility for managing their own supply chains. This includes working in partnership with our key suppliers, undertaking site visits, and embedding contractual clauses that require suppliers to meet our standards.

For suppliers outside of Europe, we apply additional due diligence measures. Some divisions are members of Sedex and use the Sedex platform, including Sedex audits, to provide assurance on labour practices in these supply chains.

These measures are being further strengthened across the Group through FY26.

Our supply chain spans the following key stages:

Product sourcing and supply – sourcing and selling construction products including bricks, roof tiles, cladding, timber, tiles, windows and doors, purchased from established manufacturers and supplied into the UK market.

Importing – importing specialist products, including bricks, roof tiles, cladding systems and flooring, much of it on an exclusive basis to the UK market.

Manufacturing and selling – through Group businesses such as Towelrads and UPOWA we both buy in and work directly with manufacturers to produce and sell radiators, solar panels, battery storage systems and EV charging technology.

Logistics – national haulage services provided by McCann Logistics, supporting both Group businesses and external customers.

Supply and fit – supply and fit services through our Contracting division, including cladding, roofing, flooring installation and fire safety remediation projects.

Our policy on slavery and human trafficking

The Group is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We are in the process of implementing our new Group-wide Purchasing Policy and Supplier Code of Conduct. This further strengthens our zero-tolerance approach and requires all suppliers to demonstrate the same commitment to eradicating modern slavery from their supply chains.

As detailed in our Environmental, Social and Governance Strategy document, we have made a Modern Slavery Training Programme available to all employees to raise awareness of, and how to report, suspicions of modern slavery and are introducing systems to track completion. In FY26 we will embed this training into induction for all new starters and into the annual review process.

Responsibilities and monitoring effectiveness

Responsibility for identifying, assessing and responding to modern slavery risks rests with the Chief Executive Officer, Frank Hanna. In order to monitor and enhance the effectiveness of our approach to modern slavery and further embed our zero-tolerance approach to modern slavery and human rights

abuses within our business and its supply chain, we will:

- Fully investigate and take appropriate action if any modern slavery-related events are reported to us directly or through our independent whistleblowing channel, SafeCall, which is available to both employees and our suppliers and their employees. To date, no reports have been received relating to modern slavery.
- Ensure that our employees remain vigilant to possible indicators of modern slavery, can identify potential risks themselves and know how to report a suspected incident.
- Continue to keep our practices, procedures and training programmes under review to ensure their ongoing effectiveness and suitability.
- Use external audits outside Europe, and Sedex membership in some divisions, to provide additional supplier assurance.

Governance

This Statement has been approved by the Board of Brickability Group PLC on behalf of the Group and in accordance with the requirements of the MSA. It will be reviewed and updated annually.

Signed,



Frank Hanna
Chief Executive Officer

Date: 22 October 2025

Modern Slavery Response and Remediation Plan

1. Purpose

This plan outlines Brickability Group PLC's approach to identifying, preventing, and remediating modern slavery risks within our operations and supply chain. It ensures compliance with the UK Modern Slavery Act 2015 and international best practices.

2. Identifying Modern Slavery Risks

We take a risk-based approach to identifying modern slavery within our supply chain and business. This includes:

- Supplier risk assessments for suppliers in higher-risk regions or industries.
- A confidential whistleblowing channel for suppliers to enable safe reporting of concerns.
- Review of supplier compliance as part of ongoing engagement.

3. Preventing Modern Slavery

We work proactively to prevent modern slavery through:

- Updating all supplier contracts to include a modern slavery clause, setting out our expectations.
- Training for key staff to ensure awareness of modern slavery risks and reporting procedures.
- Strengthening supplier engagement as we develop a clearer understanding of country-of-origin risks.

4. Remediating Modern Slavery Issues

If modern slavery is identified, we take corrective action as follows:

Step 1: Immediate Response

- Escalate the issue internally to the Senior Leadership Team and ESG Lead.
- Engage the supplier to verify findings and determine if remediation is possible.

Step 2: Corrective Action Plan (If Remediation is Possible)

- Require the supplier to take immediate corrective actions, such as:
 - Ceasing exploitative labour practices.
 - Improving working conditions.
 - Reimbursing affected workers where applicable.
- Monitor progress to ensure compliance within agreed timeframes.

Step 3: Escalation (If Remediation Fails)

- Suspend or terminate supplier contracts if they fail to take corrective action.
- Report to authorities where necessary, in line with legal requirements.
- Consider responsible disengagement to avoid harm to affected workers.

5. Governance & Continuous Improvement

- The Board reviews modern slavery risks and responses annually.
- Supplier contract updates will be rolled out to strengthen compliance.
- This plan will be reviewed annually to align with evolving regulations and best practices.