MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This statement is made in accordance with Section 54, Part 6, of the Modern Slavery Act 2015 and sets out Byrne Group's actions to understand all potential modern slavery risks related to our business, and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in our business or our supply chain.

Organisational structure

Byrne Group Ltd. is a business operating in the construction industry that offers a complete, integrated construction service. We specialise in demolition, groundworks, concrete frame construction, high quality new-build, fit-out and refurbishment. Byrne Group's subsidiaries are Byrne Bros. (Formwork) Ltd, F.B. Ellmer Ltd., O'Keefe Construction (Byrne Group) Ltd. and O'Keefe Demolition (Byrne Group) Ltd.

We are committed to being a responsible business, with integrity and respect two of our core values, and we expect our supply chain to uphold the same ethical standards.

Responsibility

- **Policy:** The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations. The Byrne Group Compliance Director has primary and day to day responsibility for implementing this policy, including monitoring its use and effectiveness, and for its review.

Relevant policies/documents

The following is a non-exhaustive list of policies/documents that assist with our approach to prevent slavery and human trafficking in our operations:

- Anti-slavery and Human Trafficking Policy
- Anti-slavery and Human Trafficking Risk Assessment
- Whistleblowing Policy
- Anti-bribery and Corruption Policy
- Corporate Social Responsibility Policy
- Responsible Sourcing Policy
- Sustainability Policy
- Company Employee Handbooks
- Human Resources Process
- Subcontractor/supplier agreements
- Eligibility to Work in the UK Procedures

- ISO 9001 Quality Management Systems
- Subcontractor and Supplier Company Profile Questionnaires
- Suppliers' OHSEQ Grading Procedure

Performance indicators

We have reviewed our key performance indicators (KPIs) in light of the Modern Slavery Act 2015. As a result, we set the following KPI:

- All new starters with the company to receive Modern Slavery Act training on joining the business.

Control measures

We reviewed our Anti-slavery and Human Trafficking Risk Assessment and our Anti-slavery and Human Trafficking Policy Statement and Policy to ascertain if our or our supply chain's risk profile had changed.

- We will continue to work collaboratively with our supply chain to endeavour to ensure they meet their legal obligations under the Act.

We also undertook a review of all our policy statements, which include:

- Anti-bribery and Corruption Policy
- Corporate Social Responsibility Policy
- Responsible Sourcing and Sustainability Policies

As part of our supply chain pre-qualification procedures, we include questions relating to the Modern Slavery Act, requesting information from suppliers on their policies and procedures.

In support of our policy, and Anti-Slavery Day, which was on the 18th of October 2026, we delivered an awareness campaign across our sites and premises. The briefing session, and supporting poster, included examples of modern slavery, how people are at risk, signs to look out for and internal and external reporting procedures.

During the reporting period, new starters received training either through our bespoke online training module or through our site induction process, which includes slides on the Modern Slavery Act.

We continued to assess employees' eligibility to work in the UK, in accordance with the Immigration, Asylum and Nationality Act 2006, as fraudulent documents can be an indication of modern slavery. The steps taken are detailed in our Eligibility to Work in the UK Procedures. We expect our supply chain to adhere to our expectations with respect to their own workforce.

We also completed an internal audit checking for compliance with our Anti-slavery & Human Trafficking Policy (AS&HT). This included establishing whether activities such as eligibility checks on our workforce were being undertaken, that employees were issued the company handbook and with it the AS&HT Policy, that employees were completing our bespoke online training module and that supply chain AS&HT due diligence was being undertaken.

We will undertake another internal audit in the year ahead.

One of our external certification bodies included the Modern Slavery Act in their assessment criteria during the audit.

We received an AS&HT audit from one of our clients.

Simon Taylor

Byrne Group OHSEQ Director

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