

**Modern slavery statement****Introduction**

Modern slavery is a criminal offence and a violation of fundamental human rights. It can take various forms, including servitude, forced or compulsory labour, and human trafficking, all of which involve the deprivation of a person's liberty for the purpose of exploitation.

This statement outlines I & H Brown commitment to preventing modern slavery and human trafficking within our business operations and supply chains. We fully support the principles of the Modern Slavery Act 2015 and are committed to playing our part in eradicating these practices. The information included in the statement refers to the year 2025 -2026.

As an equal opportunities employer, we are dedicated to fostering a respectful, inclusive, and non-discriminatory working environment for all employees. Our recruitment and people management practices are designed to ensure that all individuals are legally entitled to work in the United Kingdom and are safeguarded from abuse or coercion during the course of their employment with us.

Organisational structure

Founded in 1964, I & H Brown Limited is a medium-sized, family-owned civil engineering contractor based in the United Kingdom. The company employs over 200 people and operates from its head office in Perth, Scotland, with an additional office in Warrington, England. Operational sites and project locations are spread across Scotland and other parts of the UK.

The company is structured into several divisions reflecting our broad portfolio of activities. While our core business is civil engineering, we are also active in development, estates management, farming, and renewable energy. This diversification supports the business's long-term resilience and financial stability.

I&H Brown is controlled by a Board of Directors who are responsible for strategic leadership and governance. Senior managers oversee each division, ensuring day-to-day operations are aligned with the company's values and objectives. All employees are employed directly by the company under formal contracts of employment, which set out working conditions, hours of work, and holiday entitlement.

We are an accredited employer under the Real Living Wage Foundation, meaning all our employees are paid the Living Wage or higher. We value our people and recognise that our success depends on a committed workforce who share the company's ethos. We invest in training, personal development, and a culture that encourages initiative and responsibility at all levels.

The labour required to support our operations is wholly carried out within the United Kingdom, across various regions depending on the location of our projects.

Definitions

I&H Brown considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. We understand that this requires an ongoing review of both our internal practices in relation to our labour force and, additionally, our supply chains.

I&H Brown does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

Supply Chains

In order to fulfil its activities, I&H Brown relies on a supply chain made up primarily of suppliers and subcontractors within the UK construction sector. These include the provision of construction materials, plant and equipment, professional services, and specialist subcontracted labour. The majority of our suppliers are based in the United Kingdom, with some operating within the European Union and a small number from outside the EU.

Our supply chain is relatively straightforward in structure, with most of our direct (first-tier) suppliers having established reputations in the industry. However, we recognise that some first-tier suppliers may source materials or services through intermediary traders who, in turn, engage with lower-tier suppliers. This can create additional layers of complexity and potential risk that require appropriate oversight.

We have no direct engagement with countries considered high-risk for modern slavery and human trafficking, as identified in the Global Slavery Index. Nevertheless, we remain alert to the risks that may arise further down the supply chain, especially where transparency is limited. We expect our supply chain partners to uphold the same ethical standards as we do and to actively manage risks within their own supply chains.

Potential Exposure

The company considers its main exposure to the risk of slavery and human trafficking to exist within its supply chains, particularly where subcontracted labour or sourced materials may originate from outside the United Kingdom or European Union. While the majority of our suppliers are UK-based and subject to UK labour laws, we recognise that indirect exposure may arise through lower-tier suppliers whose practices are less transparent, especially where goods or services originate in countries with weaker protections for workers' rights.

That said, we consider our overall exposure to modern slavery and human trafficking to be relatively limited. Our operations are based entirely within the United Kingdom, where employment is regulated and monitored

Steps

The company carries out due diligence processes to ensure that slavery and human trafficking are not taking place within our organisation or supply chains. This includes reviewing the controls in place among our suppliers and subcontractors and assessing their compliance with ethical labour standards.

To our knowledge, we have not conducted business with any organisation found to have been involved in modern slavery or human trafficking.

In accordance with section 54(4) of the Modern Slavery Act 2015, we have taken the following steps to mitigate the risk of modern slavery:



- Continued development of an employee awareness strategy relating to the Modern Slavery Act 2015, including information on how to report concerns.
- Completion of modern slavery questionnaires required by clients.
- A risk-based assessment of suppliers and subcontractors based on their geographical location and supply chain structure.
- Inclusion of modern slavery clauses in subcontractor orders to ensure compliance throughout their operations.
- Issue our own modern slavery questionnaire to selected suppliers and subcontractors.
- Communication of our zero-tolerance stance to all new suppliers, subcontractors and partners at the start of each project.

Training

We are committed to increasing staff awareness of modern slavery and human trafficking risks, particularly in relation to the construction sector, this is delivered via on-line training and toolbox talks. These steps help embed awareness into our organisational culture and ensure that all staff and site personnel are equipped to identify and report any concerns.

Policies

I & H Brown is committed to conducting its business ethically and with integrity. Our commitment to preventing modern slavery and human trafficking is supported by a range of internal policies which set out our expectations and guide our behaviour across the organisation.

Relevant policies that support our stance on modern slavery include:

- Anti-Fraud and Bribery Policy
- Anti-Slavery and Human Trafficking Policy
- Corporate Responsibility and Sustainability Policy
- Equality, Diversity and Inclusion Policy
- Ethical Business Policy

These policies are reviewed regularly to ensure they remain effective and relevant. They are made available to all employees and, where appropriate, to suppliers and subcontractors as part of our wider due diligence and onboarding processes.

Governance

Ultimate responsibility for the prevention of modern slavery within I & H Brown rests with the Main Board of Directors. The Board is responsible for ensuring that our Anti-Slavery and Human Trafficking Policy, and its implementation, meet our legal and ethical obligations.

Review & Sign Off

To maintain best working practices the company reviews this policy when necessary to reflect changes in legislation and industry standards. All company policies are reviewed by the Board of Directors annually in June each year.

J SCOTT BROWN
MANAGING DIRECTOR

Date: June 2025