



# Modern Slavery and Human Trafficking Statement

## Introduction

This statement sets out Briggs Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2025 to 31 March 2026.

We recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Organisational structure and supply chains

This statement covers the activities of Briggs Marine and Environmental Services:

We currently operate in the following countries:

- United Kingdom
- Azerbaijan
- France

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Geographic analysis through assessing countries based on prevalence data of slavery and human trafficking based on reporting from international organisations such as the International Labour Organisation (ILO) and the United Nations office on Drugs and Crime (UNODC)
- Gathering data on working conditions and recruitment practices through on-site audits and engaging with local trade unions and community groups to gather insight.

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** The board of directors and senior management hold ultimate responsibility for putting in place and reviewing modern slavery policies, which are developed through a collaborative process involving HR, procurement and supply chain management, and internal audit, incorporating research, stakeholder consultation, drafting, review, approval, implementation, monitoring, and regular updates.



- **Risk assessments:** The process and broad organisational responsibility for human rights and modern slavery risk analysis involve cross-departmental collaboration in conducting risk assessments, engaging stakeholders, implementing monitoring systems, and reporting findings to senior management and the board of directors for oversight and strategic action.
- **Investigations/due diligence:** The HR department leads investigations and due diligence into known or suspected instances of slavery and human trafficking worker-related issues, procurement for supply chain assessments, and internal audit for independent reviews, ensuring thorough examination, adherence to laws, and effective corrective actions.
- **Training:** Comprehensive training programs have been conducted within the company and with suppliers, focusing on raising awareness, recognising signs, understanding legal obligations, and implementing preventive measures against slavery and human trafficking.

### Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** We encourage all our workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns can complete our confidential disclosure form.
- **Employee code of conduct** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Procurement code of conduct** We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate 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. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency workers policy** We use 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.



## Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence and reviews include [select the relevant actions from the list below]:

- 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.
- conducting supplier audits or assessments through the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular, 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

We have reviewed our key performance indicators (KPIs). As a result, we are:

- requiring all staff to have completed training on modern slavery at induction and on a biannual refresher basis
- using a system for supply chain verification whereby we evaluate potential suppliers before they enter the supply chain, and
- reviewing its existing supply chains, whereby we evaluate all existing suppliers

## Training

We require all staff within our organisation to complete an online training course on modern slavery.

Our modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available
- how to identify the signs of slavery and human trafficking
- what initial steps should be taken if slavery or human trafficking is suspected



- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative

**Director's signature:**

Iain Ross

— Iain Ross (Nov 26, 2025, 12:28pm) —

**Director's name:**

Iain Ross

**Date:** 26 Nov 2025