

UK MODERN SLAVERY ACT 2015 (“ACT”)

Statement of policy from Brand Energy & Infrastructure Services UK, Ltd. (trading as “Brand”) for 2023

This statement is made in accordance with Section 54, Part 6 of the UK Modern Slavery Act 2015 and sets out the steps the Company takes to ensure slavery and human trafficking is not taking place in our supply chains or any part of our business.

Introduction

Brand Energy & Infrastructure Services UK, Ltd (“Brand”, “the Company”) recognises that it has a responsibility to take a robust approach to preventing slavery and human trafficking in its corporate activities and ensuring that its supply chains are free from slavery and human trafficking.

Organisational Overview

This statement covers the activities of Brand Energy & Infrastructure Services UK, Ltd. The Company provides integrated specialty services to the global energy, industrial, and infrastructure markets.

Brand Supply Chain

Brand has a direct relationship with many end manufacturers of equipment, and a two or three tier down relationship with suppliers of other direct and indirect materials, goods, services and labour.

Brand purchases from a number of sources, many with UK companies which is preferable for the management of processes and policies, but a number of suppliers are also located internationally.

That being so, and in order to help prevent slavery and human trafficking in our supply chain, Brand has in place the following safeguards;

- › As part of the Procurement Process a Risk Map identifies the areas which require more dynamic reviews. Brand work with our Supply Chain partners to ensure a full understanding of their responsibilities which includes a responsibility to take action to prevent slavery and human trafficking.
- › Reviewed and updated our Global Supplier Code of Conduct (“GSCOC”) in 2023. <https://brandsafway.com/SupplierCodeOfConduct>
- › Adherence to GSCOC is included in all standard vendor contracts and purchase orders.
- › Supply Chain partners, and their direct supply chain are asked to sign BrandSafway’s Code of Conduct, and the GSOC.
- › Due diligence forms part of the Brand accreditation process, these documents set out the standards of not only HSE and Quality but also include, Sustainability and Ethics including the use of labour and adherence to relevant country legal requirements.
- › Contracts are reviewed to ensure under the Ethics section, that the supplier should ensure as much as possible that Slavery and Trafficking are not taking place in their own supply chain.
- › Regular Audits take place at high risk manufacturers located outside the UK/EU to ensure no persons working within their facilities are subject to mistreatment, have safe and fair working conditions, receive the minimum wage for the country of work and have adherence to the countries legal working practices. Brand ask them to look at the risks within their own supply chain, which includes the risks posed by slavery and human trafficking, as part of the initial and ongoing accreditation process. The Company expect that these suppliers can actively manage these risks through the use of their own policies and procedures.

- › Enhanced ethics hotline for increased accessibility for employees and third parties to report concerns with local, toll-free telephone numbers and local language speakers, QR codes for mobile intake reporting, and user-friendly website in 14 languages with 24-hour access.

The Employment of Brand Personnel in the UK

Brand carries out right to work checks on all its staff in line with government regulations. These checks are designed to ensure all direct employees of The Company have the right to work in the UK.

Brand ensures that UK workers receive minimum wage by undertaking regular reviews of contracts and conditions.

Labour agency contracts are regularly reviewed and audited in order to ensure that they comply with the law.

Relevant Policies

Some of the policies that the Company has implemented include :

- › **Global Code of Conduct:** Applies to all employees and, together with other policies, establish our expectation of ethical conduct, honest behavior and respect for one another. The Code of Conduct is intended to apply to a wide range of circumstances. As explained in the Code of Conduct, Brand believes in its role as a good corporate citizen and expresses its support for fundamental human rights and its commitment to avoid business practices that abuse human rights, including illegal discrimination and human trafficking. The Code of Conduct is available at <https://brandsafway.com/who-we-are#code-of-conduct>.
- › **Global Supplier Code of Conduct (GSCOC):** Outlines our expectations that its suppliers comply with applicable laws and regulations of the countries in which Brand does business. We expect our suppliers to conduct business with honesty and integrity, and to share in our values as outlined in this GSCOC. Specifically, the GSCOC prohibits suppliers from using or benefitting from any form of human trafficking or modern slavery, including forced or compulsory labor or any other form of involuntary labor or service which is extracted from any person under coercion, harassment, the menace of any such penalty such as the use of physical punishment, confinement or threats of violence as a method of discipline or control as defined by the International Labour Organization (ILO). Any failure to comply with these requirements may jeopardize a supplier's relationship with Brand, including potential termination or cancellation of orders or contracts. The GSCOC is available at <https://brandsafway.com/suppliercodeofconduct>.
- › **Human Rights Policy:** Guided by international human rights principles encompassed by the UN Guiding Principles, this global policy outlines Brand's support for fundamental human rights and its commitment to avoid business practices that abuse such rights. It is Brand's policy to respect and promote the human rights within the communities in which it operates.
- › **Third Party Due Diligence Policy:** Requires risk-based due diligence of all third parties with whom Brand conducts or intends to conduct business. The processes identify and preclude business interactions with person and entities with whom Brand is prohibited from doing business under any applicable government sanctions list, restricted party list or any anti-corruption or anti-bribery law or regulation.
- › **24/7 Ethics Hotline:** Service available 24 hours a day, 7 days a week, for reporting suspected ethical misconduct. Brand prohibits retaliation, and all information is submitted on a confidential

basis. The ethics hotline is maintained by a third-party provider and available online at <https://brandsafway.ethicspoint.com>.

All of the above policies are available, in whole or in part, at <https://brandsafway.com/integrity>.

Other policies relevant to addressing the risk of forced labour, child labour, slavery and human trafficking in our business and supply chains, include a Global Whistleblower Protection Policy, Global Policy Against Harassment, Discrimination & Retaliation.

Training and Compliance






Brand conducts electronic and face to face training for employees to emphasise the importance of acting with integrity and in line with our own internal Ethical Business Code, through in-person trainings, e-learning, and monthly compliance communications.

Further Information

Below is a list of useful links to resources, guides and information Brand expects all of its suppliers to consider in order to ensure they are fully informed about how to prevent modern slavery and human trafficking as well as the requirements of the Modern Slavery Act 2015.

- <https://www.gov.uk/government/publications/stopping-modern-slavery-in-business-video>
- <https://www.gov.uk/government/publications/modern-slavery-industry-factsheets>
- <https://www.gov.uk/government/publications/support-for-victims-of-human-trafficking>
- <https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>

UK business Units

Brand  ENERGY & INFRASTRUCTURE SERVICES	Hünnebeck  BY BRAND/SAFWAY	Lyndon SGB MASTCLIMBERS™ Taylor's Hoists  BY BRAND/SAFWAY  BY BRAND/SAFWAY  BY BRAND/SAFWAY
Industrial & Offshore	Forming & Shoring	Commercial Services

This statement has been approved by the Company's board of directors.

Signed
Benjamin Read
(Director)