

1. INTRODUCTION

- 1.1 BCM Construction are committed to the highest standards of ethical conduct and integrity in our business activities. We acknowledge our responsibilities under the Modern Slavery Act 2015 and are committed to preventing slavery and human trafficking in our corporate activities and within our supply chains.
- 1.2 BCM considers that modern slavery encompasses:
 - a) Human trafficking
 - b) Forced work, through mental or physical threat
 - c) Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
 - d) Being dehumanised, treated as a commodity or being bought or sold as property
 - e) Being physically constrained or to have restriction placed on freedom of movement
- 1.3 We understand that this requires an ongoing review of our internal practices in relation to employees, agents or consultants or any person or body acting on our behalf. This Policy Statement reflects our commitment to acting legally, ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure Slavery and Human Trafficking is not taking place within our company or supply chain.

2. SCOPE OF THE POLICY

- 2.1 This policy applies to all employees, temporary workers, consultants, contractors, service providers, vendors, agents and subsidiaries acting for, or on behalf of BCM Construction
- 2.2 Every employee and associated person acting for, or on behalf of BCM is responsible for maintaining the highest standards of business conduct. Any breach of this statement is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to our reputation and standing.

3. ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

- 3.1 BCM takes steps to ensure that the risks of modern slavery are minimised as far as possible, considering our own business practices and those of any organisation that supplies goods and/or services. In the operation of our business, BCM's main supply chains are labour providers and plant/material vendors. BCM considers its main exposure to the risk of slavery and human trafficking to exist in its supply chains.

4. COMMITMENTS

- 4.1 BCM has a zero-tolerance policy towards modern slavery. It will refrain from entering into business, and/or will discontinue any current business with any other organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

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4.2 No labour provided to BCM is obtained by means of slavery or human trafficking. BCM strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

5. RECRUITMENT

5.1 Our HR policies and recruitment practices ensure compliance with The Modern Slavery Act 2015 and all other relevant employment legislation. Auditing practices are in place for checking that all employees have the right to work in the UK. We are continually reviewing our recruitment methods throughout the business to ensure transparency.

6. RELEVANT POLICIES

1. **BPOL-24 Whistleblowing Policy** - We encourage all employees and others working on our behalf 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 policy is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise these with our HR Manager.
2. **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.
3. **Supplier/Procurement code of conduct** - We are committed to ensuring that its suppliers adhere to the highest standards of ethics. We communicate our policy requirements at the onboarding stage, prior to approving new suppliers. Suppliers are required to demonstrate their commitment to combating modern slavery, including the provision of safe working conditions where necessary, treating workers with dignity and respect, and acting ethically and within the law in their use of labour. Serious violations of our supplier code of conduct will lead to the termination of the business relationship.

7. DUE DILIGENCE

7.1 BCM carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its supply chains. This includes assessing areas of the business that may pose a risk, putting in controls to minimise these as far as possible. High risk suppliers are identified and audited to ensure ongoing compliance can be monitored more closely.

7.2 BCM has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with slavery and/or human trafficking.

7.3 In accordance with section 54(4) of the Modern Slavery Act 2015, BCM has contacted (or attempted to contact) all first tier suppliers to set out our zero-tolerance stance on modern slavery and to ensure that slavery and/or human trafficking is not taking place. BCM will seek to discontinue business with any first-tier supplier found by the enforcement authorities to be involved in modern slavery.

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7.4 BCM encourages use of its whistleblowing policy to report any concerns regarding modern slavery and will investigate any complaints thoroughly.

7.5 To ensure effectiveness in combatting modern slavery, BCM maintains an accurate supplier list including contact details. It will ensure action is taken in response to reports of modern slavery in its supply chains and any complaints made via the whistleblowing policy will be responded to in accordance with the policy.

8. COMMUNICATION AND TRAINING

8.1 Upon commencement of employment, all employees undergo an induction process and are made aware of our policies relating to standards of behaviour that it required from them. We are committed to raising awareness of modern slavery issues including how to spot the signs in the business and supply chain.

8.2 BCM also provides training on awareness of modern slavery to departmental leads who have been identified as having responsibilities in this regard, namely those involved in HR, finance and procurement.

9. CONCERNS

9.1 All concerns regarding modern slavery should be addressed to line managers, HR or via the See it, Sort it, Report it system. Reporting can also occur in accordance with the Grievance or Whistleblowing Policy.

9.2 All staff involved in the procurement of goods and services must contact the Procurement Manager if they have any concerns about Slavery or Human Trafficking or if they are aware of or suspect a breach of The Modern Slavery Act 2015.

9.3 The identification of any breaches will be investigated by the relevant department following BCM's Incident Investigation procedure.

10. REVIEW

10.1 This policy is endorsed by the directors of BCM Construction. It is reviewed for each financial year as a minimum.

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