

	Bethell Construction Procedure	Procedure Ref : BG / POL / 31 Issue No. : 2 Issue Date : 01.02.2023 Originated By : Emma Walker Approved By : Michael Holmes Page: Page 1 of 2
	Anti Slavery Statement	

About this policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Organisation structure and supply chains

The Group's principal trading companies are Bethell Construction Ltd ("Construction"), Bethell Utility Services Ltd ("Utility Services") and Bethell Property Services Ltd ("Property Services") with the latter merged into the Group in February 2021. The Group has around 320 employees in the UK with an annual turnover of circa £49m.

Our procurement team is committed to delivering goods and services for our operational teams, our customers and stakeholders which are sustainable, are of good quality and which represent the best value for money.

Our supply chain includes in the region of 520 suppliers. Our direct suppliers are UK based and support our business in the provision of labour, plant and materials and account for up to 80% of our expenditure.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting 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 anywhere in our supply chains. Within the policy, we have specifically outlined the roles which we expect our staff, leadership team and suppliers to take in supporting our commitment to eradicate modern slavery in all of its forms.

We take responsibility for conducting and growing our business in a safe, sustainable and responsible manner. We understand the impact our activities can have on the environment and society around us, and endeavour to ensure we eliminate or mitigate the risk of negative impacts and leave a positive legacy in the communities where we work. Our Strategy House sets out specific targets around carbon reduction. Green initiatives and Social value making sustainable decision making an integral part of the way we do business.

Due diligence processes

Modern slavery compliance is an integral part of our supplier approval and re-qualification processes. As part of our supply chain accreditation process, we require our supply chain to comply with the Modern Slavery Act 2015. We include our Anti-Slavery Policy in our contracting processes to ensure our supply chain are aligned against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude.

Our people are subject to various appropriate pre-screening checks during recruitment. This includes right to work checks pre employment and throughout employment for those individuals whose right to work is not permanent.

Risk assessment and management

We have assessed our business for the potential for the risk of modern slavery and concluded that the main area where modern slavery could occur is within the workforce of our supply chain.

We manage these risks:

- By committing our direct supply chain to complying with our Anti-Slavery Policy
- By selecting responsible providers through a proper due diligence process and continued engagement with them on their labour resources

- By right to work and other identity checks on commencement of employment
- By training and educating our workforce
- By auditing our supply chain partners compliance with our policies.

Training on modern slavery and trafficking

We recognise that appropriate training on modern slavery and the use of forced, compulsory or trafficked labour will increase awareness among our people as well as mitigating the risk within the business and the supply chain.

Our Code of Conduct forms part of our induction process for all new starters and is a compulsory training requirement for existing employees within the business. It explains what modern slavery is and informs our people that it is their responsibility to help prevent, detect and report incidences of modern slavery. It advises our people to raise concerns about incidences of modern slavery through management.

We are partners of the Supply Chain Sustainability School through which we provide specific training to our procurement team on the relevant legislation.

We have included in our tool box briefings to our projects a specific briefing on modern slavery advising our people on the warning signs to look out for where there may be incidences of modern slavery and advising them how to report any concerns.

Processes for reporting slavery and human trafficking

The business' approach to the prevention of modern slavery has stakeholder buy in from the highest levels of management within our organisation. The policy has been considered and formally ratified by the board. The Head of People & Development is the appointed Compliance Officer.

The Compliance Officer is responsible for dealing with concerns about compliance with the Act and protections in place for anyone who brings matters of concern to our attention.

We are satisfied that we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.
- We have no reason for concern in relation to any current member of the supply chain and their compliance with the Modern Slavery Act.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and applies to all companies in our Group.

It constitutes our Group's slavery and human trafficking statement for the financial year ending 30th September 2023 and outlines the steps we have taken as an organisation to assess our operations and supply chain and mitigate any risk of slavery and human trafficking.



Emma Walker
Head of People & Development