

# BUILT WITH:

## MODERN SLAVERY & HUMAN TRAFFICKING POLICY

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### POLICY STATEMENT

#### For the Financial Year 2023/24

This policy is made in accordance with Section 54, Part 6, of the Modern Slavery Act 2015 and sets out BW's actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business or our supply chain. BW operate a zero—tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all our business dealings.

#### Who we are

BW are building fit out specialists, operating within London and the South East of England. Our head office is based in the City of London.

#### Our policies & practices

We operate a number of internal policies to ensure that we are conducting our business in an ethical and transparent manner these include:

- HR & Talent Management Policy provides an overview of HR in BW and how they are there to support employees, managers and ensure company legal compliance in all employment matters.
- Recruitment & Selection Policy confirms that eligibility to work in the UK and do so of their own free will. Checks are conducted on all employees, including but not limited to checking an original passport, birth certificate or other qualifying documentation
- Supplier code of conduct policy sets out our expectations of our suppliers to have suitable policies and processes in place within their own businesses to prevent child labour, modern slavery and human trafficking and to cascade those policies to their own suppliers.
- Equality and diversity policy - Ensuring that all our staff are employed and treated legally and fairly and all employees receive training around this
- Whistleblowing Policy. This ensures all employees know they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear or reprisals.
- Grievance policy ensures employees can safely raise any concerns about the treatment they may be receiving, or an aspect of their work and a process will be followed to investigate this.

These policies are available to all staff and are listed in our employee handbook.

All our employees are appropriately remunerated for their work, we do not operate unpaid internships, and all apprenticeships are undertaken in accordance with government guidelines to ensure they are not exploitative. We do not employ child labour.

## Training

In order to ensure the highest level of understanding in the risks associated with Modern Slavery and Human Trafficking, BW provides training for all staff members at their induction to ensure that they can recognise signs of slavery and know what to do if they are concerned. This is compulsory training for all staff.



**Steve Elliott** | BW Chief Executive Officer

January 2024