

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

POLICY STATEMENT

BW is committed to preventing modern slavery, human trafficking, forced labour, and exploitation within our business operations and throughout our supply chains. This statement is made pursuant to the UK Modern Slavery Act 2015 and reflects our ongoing dedication to ethical business conduct and human rights.

We recognise our responsibility to be alert to the risks, however small, in our business and supply chain. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our organisation or those we work with.

This policy is guided by the following legislation and frameworks:

- Modern Slavery Act 2015
- Employment Rights Act 1996
- Immigration, Asylum and Nationality Act 2006
- National Minimum Wage Act 1998
- Health and Safety at Work etc. Act 1974
- UN Guiding Principles on Business and Human Rights

Who are we

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

Our Policy and Practices

We are committed to preventing modern slavery and human trafficking in all areas of our business and supply chain. As part of this commitment, we assess the risk of modern slavery by reviewing our operations, suppliers, and sourcing countries, particularly in high-risk sectors such as construction, cleaning, and imported materials. We consider factors such as geography, type of labour, and supply chain transparency, and take appropriate steps, including supplier due diligence and contractual safeguards, to mitigate any identified risks. Our assessments are reviewed regularly to ensure ongoing compliance and ethical practices.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, BW requires all staff to complete mandatory online and/or in person training courses.

All members of the HR Team are required to complete CPD-accredited Right to Work and Sponsorship compliance training. This specialised training ensures they are fully equipped to conduct legally compliant checks and identify potential indicators of exploitation, in line with UK employment and immigration legislation.

Policies

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

- 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 of reprisal.
- Recruitment & Selection Policy confirms that eligibility to work in the UK and do so of their own free will. In compliance with UK employment and immigration laws, Right to Work checks are conducted on all individuals prior to the commencement of employment. These checks include, but are not limited to, verifying original documents such as passports, birth certificates, or other acceptable forms of identification as prescribed by legislation.
- 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.
- 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.
- Illegal Worker Policy to ensure compliance with UK immigration and employment laws by preventing the employment of individuals who do not have the legal right to work in the UK. It sets out clear procedures for conducting Right to Work checks prior to employment.

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

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Management Board endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:



Steve Elliott | BW Chief Executive Officer

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BUILT WITH: COMPLIANCE

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