

# **Slavery & Human Trafficking Policy**

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# Slavery & Human Trafficking Policy

Bowmer + Kirkland Ltd and its subsidiaries (the Group) is committed to maintaining and improving our systems and processes, to avoid complicity in human rights violations, related to our both own operations and that of our supply chain. The Group recognises that slavery and human trafficking occur in many forms. Therefore, throughout this disclosure we use the terms “slavery and human trafficking” to incorporate all forms of coerced labour.

Our commitment to human rights is embedded within our culture and reflected within the Group policies and procedures. We are conscious of our obligation to improve and implement the Code of Conduct across our supply chain. The Group will strive to ensure that slavery and human trafficking is not taking place within our directly employed workforce or forming any part of our supply chain.

This transparency and disclosure obligation under the Modern Slavery

Act 2015 within our own business and within our supply chain is expected of all business partners we come into contact with across our usual operations. As part of our conditions of working with us we include specific clauses that prohibit the use of forced, compulsory or trafficked labour including anyone held in slavery or servitude.

We are totally opposed to and have a zero tolerance of any involvement within the modern slavery industry and are committed to act ethically and with integrity in all of our business dealings.

In addition to the legal requirement we have also agreed to uphold The Athens Ethical Principles, which demonstrate our proactive commitment towards ending modern slavery and human trafficking by the year 2030.

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# Slavery & Human Trafficking Policy (cont)

## Responsibilities for the Policy

Overall responsibility for compliance to this policy and its review is with the board of directors of Bowmer + Kirkland Limited. The Group Business Development Director will be the lead role for the review and administration of this policy alongside the HR Manager and Quality Systems Manager. Management at all levels are responsible for ensuring they understand and comply with this policy and are up to date with issues relating to modern slavery in supply chains.

## Compliance with the Policy

All staff are aware of the policy and suitable information and training is made available to ensure a clear understanding of the issues relating to modern slavery within our business and the supply chains.

Any concerns relating to issues with the company and its supply chain and in connection with modern slavery are reported at the earliest possible stage via Business Development and line managers or reported in line with our grievance procedure and whistle blowing policy.

We aim to encourage openness in reporting if these matters and will support any member of staff throughout investigations raised in good faith.

Our in-house, direct recruitment processes are reviewed regularly and include face to face communications with

any potential candidates. We also confirm identities by checking originals of relevant identification documents and ensure all payments are made directly into a personal bank account.

Within our supply chain we are implementing processes to ensure, as reasonably practicable, that our supply chain are adhering to our expectations within their own workforce. These requirements necessitate that our approved supply chain demonstrates the steps they are taking to ensure slavery + human trafficking are not taking place within their businesses and their own supply chains. The Group will be carrying out targeted audits within areas of our supply chain, which are identified as most at risk, alongside random audits of our general supply chain members.

## Communicating our Policy

The Board of Directors and all of the Group's team encourage anyone (including employees, sub-contractors, suppliers and clients) to report in good faith any issues or concerns regarding ethics, human rights, legal or regulatory violations, including improper or unethical business practices such as fraud, bribery and any concerns regarding slavery and human trafficking.

## Awareness of this Policy

Awareness of this policy is raised via our regular updates to all of our team and is included within our welcome pack and induction for all directly employed

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personel further training will be provided as necessary.

Within our supply chain the compliance with this policy is covered within our preconstruction meeting requirements and within both our terms of business and Codes of Conduct that are regularly audited both internally and externally.

## **Breaches of this Policy**

Any individual or business to be found in breach of this policy will face disciplinary actions.

**Signed:**

**J A C Kirkland - Chairman  
Date 31st January 2022**