

Modern Slavery Act Policy Statement

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Revision History

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1. Purpose

This statement sets out BJF Groups actions to understand all potential modern slavery risks related to its business and to put in place steps aimed at ensuring that there is no slavery or human trafficking in its own business or its supply chains.

2. Introduction

BJF condemns slavery in all of its forms. We are fully committed to working with our customers, our business teams and our supply chain partners to support human rights and the welfare of the employees working on our contracts and projects. We are committed to taking measures to prevent the occurrence of modern slavery in our business or supply chains, and to monitoring the effectiveness of those measures.

3. Definitions

Human Trafficking: the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Forced Labour: all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

Harmful Child Labour: consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

4. Organisational Structure

BJF Group is a multidisciplinary business with five complementary divisions. These divisions consist of M&E, Construction, Facilities Management and Reactive Works, Project Services and MEP Residential.

5. Relevant Policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Ethics & Equal Opportunities.** Health and safety, wellbeing and working conditions of our employees are high priorities for BJF. We set high standards of corporate governance, supported by policies and procedures applied throughout our business. These cover human rights and our social responsibility. HRP003 Equality, Diversity and Ethics Policy.docx
- **Whistleblowing Policy.** The Company encourages all workers, customers and other business partners to report any concerns related to the direct activities or the supply chains of the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing policy is designed to make it easy for workers to make disclosures

without fear of retaliation. Employees, or others, who have concerns can contact the Human Resources Department or a Director. Reports can remain anonymous and any incident that is a potential slavery or trafficking event is identified as high alert, to be dealt with immediately. As appropriate, the event will be shared with the Manager responsible in conjunction with Internal Audit. [HRP007 Whistleblowing Policy](#)

- **Recruitment Commitment.** The Company has the benefit of an internal directly employed recruitment team who have received training. However, when there is a requirement to utilise employment agencies, we only use those who are specified and reputable to source labour and always verify the practices of any new agency it is using before accepting workers from that agency. All employees of the business are required to show proof of their right to work. We also ensure that the recruitment agencies used are members of the Recruitment and Employment Confederation (REC), as the professional body sets standards to be followed in the recruitment process.
- **Supplier/Procurement Code of Conduct.** All suppliers are to be assessed and approved, specifically we request written confirmation of their agreement to operate within our code of conduct. The Company is committed to ensuring that its suppliers adhere to the highest standards of morals and ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their workers' working conditions where necessary. Serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.
- All suppliers will be made aware that BJF Group will not be associated with organisations that are involved in slavery or human trafficking, and this will be communicated to them annually.

6. Assessment of Risk in Supply Chain and Due Diligence of Suppliers

6.1. Supply Chain

We are aware that our biggest risks lie in our supply chains. To combat such risks, we operate a policy of only contracting with accredited and approved supply chain partners. We ensure that all new contracts contain modern slavery clauses and all suppliers may be subject to announced and unannounced audits. Audits are carried out onsite and include interviewing workers.

We expect our suppliers to support and demonstrate our values, which are an essential component of our approach to Sustainability. The standards we expect from our suppliers address a broad spectrum of working conditions including, but not limited to, fair remuneration, working hours, no child labour, respect, non-discrimination, health safety and wellbeing, as well as freedom from forced labour. We will assess all instances of non-compliance, taking appropriate remedial action in a timely manner and as expeditiously as possible.

As part of our tendering process, we require that suppliers agree to adhere to our published charters for ethical sourcing and labour standards – a key part of our sustainability strategy and we also ask suppliers to confirm compliance with the Modern Slavery Act at the pre- accreditation stage. We will not progress to working with suppliers which do not agree to comply with the Act.

We recognise that particular types of suppliers are likely to give rise to a higher risk of modern slavery,

in particular those utilising lower-wage, low skill staff such as construction workers, security, couriers, cleaning, agriculture and those utilising manufacturers in low-wage countries. Where, through risk assessment, we perceive a particular risk of modern slavery, we will continue to undertake enhanced due diligence, asking additional questions during the procurement process tailored to the specific risks to ensure the supplier meets acceptable standards.

7. Accreditation

BJF has an accreditation process in place for all of our suppliers. This process seeks to ensure that our suppliers are safe and competent to carry out the work we require, and that our suppliers work ethically and sustainably. We ensure that suppliers understand the standards we expect of them, within their company and across their own supply chain.

8. Audits

BJF takes welfare standards seriously and believes that everyone has the right to be treated in a manner that ensures their wellbeing, health, safety and security.

9. Contracts / Legal Documents

BJF has amended our standard contractual terms for suppliers to include obligations on suppliers to comply with the Modern Slavery Act. This requires suppliers to maintain records that allow traceability throughout our supply chain, to report breaches and to detail the steps taken to ensure there is no slavery or human trafficking in their operations. BJF may terminate a supplier agreement with immediate effect if it identifies that a supplier is breaching or has breached BJF's policy on anti-slavery and human trafficking.

BJF aims for a high standard of governance within our business, and has implemented policies, procedures and mandatory training designed to create a responsible business culture, which defines the way we do business and enables us to achieve high-standards of customer service, risk management and accountability.

10. Training

As part of BJF's commitment to identifying and eradicating modern slavery, we want to ensure that all of our people understand what is meant by modern slavery, understand how to recognise it, and how to act in the event that they consider that somebody is a potential victim of modern slavery.

The Company's modern slavery training covers:

- the issue of this Policy Statement;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;

- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the Company should take if suppliers or contractors do not implement antislavery policies in high-risk scenarios, including their removal from the Company's supply chains

We also hold regular briefings at site level. Through our monthly 'Toolbox Talks and Team Meetings, all our employees have been fully briefed about the Modern Slavery Act. The briefing also reminds our people that if they suspect or are concerned that someone is a victim of modern slavery, they should contact the HR Department or a Manager within the business.

We also assign an e-learning course to all employees in a category deemed to require a certified course, such as management, procurement and supply chain team members, and HR.

11. Key Performance Indicators

The risk of modern slavery is one which requires continuous monitoring to ensure effective prevention throughout the business. In order to assess the effectiveness of the measures put in place, we will review the effectiveness of the following performance indicators and report on them in future Modern Slavery Act statements;

- training and capacity building of staff about modern slavery issues and measuring changes in awareness of risk;
- monitoring grievance procedures and whistleblowing procedures if cases are suspected or found, and the outcome/resolution;
- visibility, leverage and oversight of suppliers in relevant supply chains for goods and services; and
- number of supplier due diligence visits completed.

12. Director Sign off



Barry Foster
Managing Director

For and on Behalf of BJF Connections Ltd

Dated: 01/04/2025