

Baird & Co Ltd



Baird & Co.
Bullion Merchants
Est. London 1967

Modern Slavery and Human Trafficking Statement 2026

1. Introduction

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and sets out the steps taken by Baird & Co. Ltd ('Baird & Co.' or 'the Company') to prevent modern slavery and human trafficking within its business and supply chains.

This statement relates to the financial year ending 31 December 2025 and is published in 2026.

Baird & Co. has a zero-tolerance approach to modern slavery and is committed to acting ethically, with integrity and transparency in all business dealings.

2. Organisational Structure, Business and Supply Chains

Baird & Co. Ltd is a private limited company registered in England & Wales (Company No. 02269558). The Company operates in the precious metals sector, specialising in:

- Precious metals refining
- Trading and investment products
- Scrap purchasing
- Manufacturing materials and engineering products

The Company operates internationally, supplying products to approved regions and maintaining relationships with a global network of suppliers and counterparties.

We recognise that the nature of the precious metals industry presents inherent risks of modern slavery, particularly within complex global supply chains and in conflict-affected and high-risk areas.

During the reporting period, no instances of modern slavery or human trafficking were identified within the Company's operations or supply chains.

3. Policies in Relation to Modern Slavery and Human Trafficking

Baird & Co. maintains a comprehensive framework of policies and procedures designed to prevent modern slavery and human trafficking. These align with internationally recognised standards, including:

- LBMA Responsible Gold Guidance
- LBMA Responsible Silver Guidance
- OECD Due Diligence Guidance for Responsible Mineral Supply Chains
- UK Bribery Act 2010
- OECD Anti-Bribery Convention
- International Labour Organization (ILO) Conventions
- Extractive Industries Transparency Initiative (EITI)
- Responsible Jewellery Council Code of Practices

Supporting internal policies include:

- Anti-Money Laundering (AML)
- Know Your Customer (KYC)
- Anti-Bribery and Corruption
- Whistleblowing Policy
- Supply Chain Due Diligence Policy

All policies are reviewed annually and are accessible to employees.

4. Risk Assessment and Management

Baird & Co. recognises that risks of modern slavery are most prevalent in:

- Artisanal and small-scale mining
- Conflict-affected and high-risk areas (CAHRAs)
- Complex international trading environments

To manage these risks, the Company applies a risk-based approach, including:

- Screening all suppliers and counterparties against CAHRA lists
- Conducting enhanced due diligence for high-risk jurisdictions
- Monitoring supply chain exposure to geographic and sector risks

5. Due Diligence Processes

Baird & Co. undertakes due diligence on all suppliers, customers, and trading counterparties. This includes:

- Risk-based AML and KYC procedures
- Assessment of geographic and industry-specific risks
- Responsible sourcing verification
- Ongoing monitoring and periodic review

The Company's Supply Chain Due Diligence Policy 2025 and Compliance Report 2025, available on the Company website, provide further detail on these processes.

Supply chain due diligence processes are independently audited on an annual basis. Where risks are identified, appropriate mitigation steps are taken, and relationships may be terminated if standards are not met.

6. Training and Awareness

Baird & Co. provides regular training to relevant employees to ensure awareness of modern slavery risks and indicators. Training includes:

- International Labour Organization (ILO) standards
- Indicators of forced labour and human trafficking
- Ethical Trading Initiative (ETI) guidance
- Internal reporting procedures

Training is delivered annually, with refresher sessions as required.

Employees are encouraged to report any concerns through the Company's Whistleblowing Policy. Guidance from the UK Government, including access to the Modern Slavery Helpline, is communicated to staff.

7. Effectiveness of Measures

The Company monitors the effectiveness of its approach through:

- Internal compliance and policy reviews
- Independent external audits
- Ongoing supplier and counterparty monitoring
- Staff training programs

These measures support the identification and mitigation of risks associated with modern slavery and ensure continued compliance with legal and regulatory requirements.

8. Continuous Improvement

Baird & Co. remains committed to continuously improving its approach to tackling modern slavery. Future priorities include:

- Strengthening supply chain transparency
- Enhancing due diligence procedures
- Maintaining alignment with international best practices

9. Publication

This statement is published on the Company's website in accordance with Section 54 of the Modern Slavery Act 2015.

10. Approval

This statement was approved by the Board of Directors of Baird & Co. Ltd as on April 2026