

Modern Slavery Act

This statement demonstrates the steps Bagnalls has taken and continues to take to eliminate the risks of slavery, forced labour, human trafficking, and exploitation, within our business and that of our supply chain.

Organisational Structure & Supply Chain

We recognise that our responsibility for human rights, labour conditions and anti-slavery encompasses:

- **Our Group and Branch Network**– Our staff are directly employed and based in the UK. We do not normally undertake work overseas. We are a fair employer and ensure that our company values and policies are communicated to all employees.
- **Our Supply Chain**– It is our aspiration that the working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions. Audit and assessment processes are carried out across our supply chain to ensure their commitment to the requirements of the Modern Slavery Act.
- **Our Customers**– We are an ethical business and continue to meet the high standards of our customers by achieving the required assessment criteria and meeting the demands of independent, external audits. We also comply with customers' Codes of Conduct and policy requirements.

Policies and Meeting the Requirements of the Modern Slavery Act, 2015

Bagnalls' policy on Human Rights and Labour Conditions has been updated to reflect our responsibilities under the Modern Slavery Act, 2015 and our commitment to acting ethically and with integrity in all our business relationships.

- The Board of Directors have overall responsibility for demonstrating, through clear and visible leadership, that human rights are integral to the way we do business.
- The Directors are also responsible for monitoring compliance with the policy in all aspects of our business.
- Managers and supervisors provide visible leadership that promotes human rights as an equal priority to other business matters.

- We also believe that all our employees are responsible for helping to ensure that we operate free from human trafficking, human rights abuses, slavery, and forced labour.
- We will report any instances where we identify common signs of forced labour (all work or service which is extracted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.), in line with the International Labour Organization (ILO) guidance. These include:
 - Abuse of vulnerability
 - Deception
 - Restriction of movement
 - Isolation
 - Physical and sexual violence
 - Intimidation and threats
 - Retention of identity documents
 - Withholding of wages
 - Debt bondage
 - Abusive working and living conditions
 - Excessive overtime
- Colleagues are encouraged to bring forward, in confidence, concerns that they may have about any abuse, via our Whistleblowing Policy.

Internal Processes including Risk Assessment

We have established business practices, which are regularly reviewed, to prevent slavery, forced labour, human trafficking and exploitation in our business:

- Bagnalls has undertaken a thorough Risk Assessment to identify and assess potential risk areas in our business. It details the potential risks, who could be harmed and how, the control measures in place, and how they will be checked. An annual review is undertaken to ensure that the risk assessment and controls are in place and being adhered to.
- We conduct checks to ensure our employees have the right to work in the UK before commencing employment with us;
- We directly employ our people rather than using agencies to provide labour, wherever possible;
- We are a Living Wage employer and require sub-contractors employing people to work on our contracts lasting 8 weeks or longer to pay the Living Wage to those people working on our sites.

- We have a trained Designated Safeguarding Officer on our Board of Directors to whom safeguarding issues can be reported which may include child exploitation;
- We promote our Whistleblowing Policy to all employees to encourage them to openly report concerns about slavery, forced labour, human trafficking, exploitation, or other human rights abuses; and
- We provide training to employees to understand the issues of forced labour, slavery, and trafficking and what they should do if they suspect these issues may be occurring on sites where they work.

Due Diligence to Reduce Risk - Vetting our Supply and Subcontract Chain and other Third Parties

As part of our initiative to identify and mitigate risk we have taken steps to eradicate any slavery or human trafficking in our supply chain. We therefore acknowledge our duty to continually review and monitor our supply chain including suppliers, subcontractors, labour agencies and any other related third parties.

The Government has recognised the construction sector as being a high-risk industry for modern slavery and associated issues. As such, our continued focus is vetting and monitoring those companies who supply us with specialist labour trades to support our contracts.

Regular vetting and auditing takes place to:

- Monitor, review and update our approved supplier/subcontractor vetting process;
- Ensure that suppliers have policies and procedures in place to vet and monitor their supply chain, especially where this is not located in the UK.
- Ask all current subcontractors/suppliers to detail their processes for vetting their labour and what steps they have taken to prevent slavery, forced labour, human trafficking, and exploitation in their business and that of their supply chain;
- Develop long-term relationships within our supply chain, especially companies/individuals who hold similar values to ourselves;
- Remove subcontractors/suppliers from site and/or our approved suppliers' list where concerns are raised, until further investigations take place.

Training on Modern Slavery

- To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and our supply chains, we have an ongoing

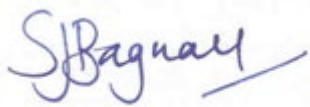
training programme in place to ensure 100% of our permanent employees are trained in our respective policies and procedures.

- Furthermore, we maintain a target of 100% compliance by subcontract companies supplying us with specialist labour and key suppliers of products to complete a questionnaire which details their vetting processes in relation to modern slavery.

Goals and KPIs for 2023-2024

We have reinforced our commitment to our legal obligations by registering with the Government's Digital Registry, to promote further the positive steps Bagnalls is taking and to send a strong signal to our customers and shareholders about the value of transparency. ([Modern slavery statement registry - GOV.UK \(modern-slavery-statement-registry.service.gov.uk\)](https://modern-slavery-statement-registry.service.gov.uk))

- Joanne Gualda, Director, with the support of the Board, will remain focused on maintaining our registration to continually meet the requirements of the Modern Slavery Act, 2015.
- As a company, we will continue to monitor the effectiveness of our training and vetting processes, making changes where necessary to remain legally compliant and to demonstrate best practice as a responsible employer.
- We will continue to be vigilant when working on sites with other contractors where our management are not in sole control of a contract.



Stephen Bagnall, Group Managing Director

21.7.23