

# MODERN SLAVERY AND HUMAN TRAFFICKING POLICY



## Policy Statement

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Within Bell Group UK Limited (and all associated subsidiary companies) we have a zero tolerance approach to modern slavery. We are committed to driving out acts of modern day slavery and human trafficking by acting ethically and with integrity in all our business dealings and relationships. We endeavour to implement and enforce effective systems and controls to ensure modern slavery is not taking place in any activity related to our business or throughout our supply chain, including subcontractors and partners. The company will not support or deal with any business or individual knowingly involved in slavery or human trafficking.

We use the following framework to focus on six areas of our business, which ensures our efforts are maximised and appropriate in line with our business activities:

- 1. Structure, business activities and our supply chains*
- 2. Policies in relation to slavery and human trafficking*
- 3. Identification of risks together with steps taken to prevent and manage that risk*
- 4. Due diligence processes in relation to slavery and human trafficking within our business and supply chains*
- 5. Effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chains, measured against appropriate KPIs, and*
- 6. Training and capacity building about slavery and human trafficking*

We acknowledge our responsibility to the Modern Slavery Act 2015 and will ensure transparency within our Organisation. This shall include the communication of Bell Group's Policy and implementation of our anti-trafficking procedure throughout our full supply chain to the best of our ability. The full supply chain refers to both suppliers of goods and services to the organisation as well as our own employees and any other stakeholders of Bell Group UK Limited. We expect the same high standards from all of our Contractors, suppliers and other business partners, and as part of our contracting process, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

The Company pledges to ensure adequate levels of management control required for these sources and will continually monitor this. The Board of Directors and senior management shall take responsibility for implementing this policy and its objectives and shall provide adequate resources to monitor our risk and control measures through various channels to ensure that slavery and human trafficking is not taking place within the organisation or within our supply chains. Our monitoring methods shall include, but are not limited to;

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- Training of site staff to spread awareness of this issue
- Making our Policy available to all employees,
- Close monitoring of branch operations by Senior managers,
- Consideration of feedback from contracts staff and site operatives,
- Through one-to-one career assessments with staff
- Through ensuring we continue to utilise the resources of Constructionline in engaging suppliers
- Through liaising with Constructionline to set up 'meet the contractor' events UK-wide
- Through attending conferences and events in relation to this topic to make certain that we keep up to date with current legislation and implement adequate procedures.

The Board of Directors reviews this policy and our monitoring procedures annually.

**For and on behalf of Bell Group UK –**

CEO, Craig Bell

(BELL GROUP UK AND BELL DECORATING GROUP LIMITED)

Reviewed: 20<sup>th</sup> Oct 2020

Review Date: 21<sup>st</sup> Oct 2021