

Modern Slavery Statement 2023

As a family owned and operated Organisation with sustainability at the heart of our every endeavour, we have capitalised on the process of undertaking recent Modern Slavery Assessments, as well as government guidance from Crown Commercial, to substantially improve our own internal policies on Human Trafficking and Modern Slavery Awareness.

There is a myriad of information available on internet about modern slavery, but when it gets down to creating a strategy which will lead to real and meaningful improvements, there isn't a clear cut answer. We have used guidance from Crown Commercial to present to our CSR Forum and also Board of Directors, in order to assist with focusing our actions. For 2021 our strategy to improve focuses on; risks assessment and management, due diligence and KPIs.

We have updated our policy twice in the last 12 months. This now includes a six-step agenda to being more thorough in our planning and actions and to reflect the changes to our risk management and due diligence strategy. The statement itself now also includes details on KPIs which we have adopted as of 2020.

Risk Management includes;

Modern slavery risk factors, relevant to our business, detailed on our risk register, which is regularly reviewed by the Board and analysed to address priority risks, including degree and kind of responsibility.

We have evidenced engagement with workers to help identify and mitigate risks in the most relevant manner. We have recorded ongoing revision, reflected in our Risk Register and associated policies and procedures, and we are keen to demonstrate our continued development, commitment to prevention and approach to management of such risks

Improvements to Due Diligence involves

- Measuring our progress of risk controls using a remedy plan and using specific KPIs to continuously monitor and improve.
- Changes in operational practices; we have launched training programmes on our electronic portal to raise awareness internally; we have included tips, Bell policies and information on reporting within our subcontractor handbook; launched initiatives through our Community Engagement Coordinators and CI Manager to mitigate modern slavery risk
- Direct engagement with suppliers – we have not introduced supplier audits inherent to modern slavery checks, however we have included moderate checks within our own internal audit checklists to check for Bell policy and contractual compliance for all subcontractors
- Direct engagement with workers – Bell Tribe Key Beliefs core group and our ESG improver group involving foremen and operatives from all job roles to give input on issues and strategy, policy and procedures. Within those 2 forums we cover modern slavery issues on the agenda.
- Grievance mechanisms now detail modern slavery and human trafficking within our policies and through stakeholder engagement for workers, contractors and in the supply chain, we have controls in place and a whistleblowing procedure to deal with such reports, aligned with relevant best practice.

- In 2023 we have set up a new CSR Due Diligence Team to investigate any whistleblowing issues raised (outwith H&S) which involve complaints, HR issues or CSR matters. These 10 senior leaders have undertaken external training on Modern Slavery and Investigative skills to identify and action best practice.

KPIs include:

We have adopted two new KPIs to monitor areas of our business and supply chain to gauge our performance of anti-slavery actions we have undertaken as an Organisation.

Our modern slavery KPIs have been produced in collaboration with external and internal stakeholders through our CSR forum, and within that forum we have started to regularly review our progress against evidence of;

- impact on workers (through our site audit process)
- change in business practices (recording specific actions on this subject)
- risk management and controls (risk maps / register)
- outcomes, including changes in awareness of modern slavery amongst our key employees
- findings from ongoing monitoring and review and how these have fed into Bell business practices (MSR and CSR forum agenda)
- Audit, inspection and review
- stakeholder engagement for established best practice

We have made a major investment in a new ERP throughout the full Group, which allows for much more in-depth reporting on elements of our business. There was a concentrated focus on ‘reporting capability’ on CSR, sustainability and Compliance KPIs within the implementation of our new IT, such as diversity and supply chain management, and we have added extra dimensions to help with this analysis.

Our purchasing and subcontract ERP modules and our departments have already started a mapping process of our supply chain; highlighting key areas of risk, business structures, relationships with suppliers & contractors, roles and responsibilities. We are also looking at partnering with external organisations to help manage modern slavery risk. Moreover, we have initiated a communication strategy with suppliers and other key stakeholders on modern slavery, which will be aligned with our current endeavours with employees specifically on this subject.

Communication

In the past year, additional Modern Slavery awareness raising and training through our online e-learning portal, iHasco, has given 100% of our employees the opportunity to increase their understanding of the issues of modern slavery; what it is, how to spot the signs, and how to report it.

