

## **MODERN SLAVERY ACT POLICY**

### **For the Financial Year Ending 31st December 2017**

This statement is made in accordance with section 54, part 6, of the modern slavery act 2015 and sets out BW's actions to understand all potential modern slavery risks related to our business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business or our supply chain.

### **Our Policies and Practices**

Our policies on Recruitment; HR and talent management; selection and management of supply chain and equality and diversity in employment ensure that all our staff are employed legally and fairly; and our whistleblowing and grievance policies ensure employees can safely raise any concerns. These policies are available to all staff, and are listed in our employee handbook. As part of our recruitment process, checks are made to ensure all employees are legally entitled to work in the UK, and do so of their own free will.

All our employees are appropriately remunerated for their work, and we are currently working with the living wage Foundation to become an accredited living wage employer. We do not operate unpaid internships, and all apprenticeships are undertaken in accordance with government guidelines to ensure they are not exploitative. We do not employ child labour.

### **Our Supply Chain**

We rely on our supply chain and subcontractors to deliver our projects, and therefore this is where our greatest risk lies. Whilst we can control their operations on our sites, we do not have control over their operations elsewhere. Products used on our sites and in our finished buildings may also be produced in parts of the world where human rights legislation is not as extensive as that in the UK. However, we are able to take the following steps to minimise the risks.

- As part of our environmental strategy we aim to source as many products as we can locally, within the UK or EU; but this is not always possible due to the complexity and variation of our projects.
- All those employed on our sites, either directly or through our supply chain, are checked to ensure they are also legally entitled to work in the UK. This is carried out as part of our standard induction processes and checks.
- All subcontractors that are employed on any of our jobs, even if only once, are now listed on our internal online subcontractor database. This allows anyone at BW to quickly and easily see their company details; where and when they are employed, and track the company expenditure with them. The database also shows the status of the subcontractor within our approved supplier hierarchy, and how their performance has been scored by our teams for recent projects.
- This tool is new and still under development. Future updates shall add our suppliers; and also include information on what each company is doing to address their risk of modern slavery and human trafficking.
- We shall support smaller organisations, who do not come under the requirements of this Act, to provide this information wherever possible.
- Many products used in our projects are sourced with certification of sustainable and responsible sourcing, such as EPDs or BES6001 certification. Whilst this does not give a guarantee against human trafficking or modern slavery, it does give greater transparency to where and how these products are made.

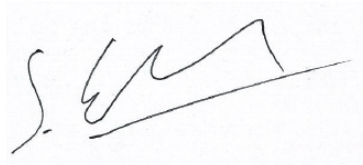
## **MODERN SLAVERY ACT POLICY** (CONT/)

### **Effectiveness of Risk Management**

As the scope of the supply chain within the construction industry is so broad, our KPIs for this year will focus on building a greater understanding of our risks and the actions that can be taken to address these:

- Identify key product types with a greater risk of modern slavery or human trafficking, and to keep a register of these with ways to mitigate this risk or source alternatives.
- Update the criteria for our subcontractors to achieve approved or preferred status to include provision of information on modern slavery and human trafficking risks.
- To work across our supply chain and client base to raise awareness of the issues relating to this Act through CPD sessions.

Our HR team have attended an educational event on modern slavery cct provided by the supply chain sustainability school. Further key members of our project management team shall also undergo training on the issues involved in this, with additional in-house training sessions developed as necessary.



**Steve Elliott**  
Chief Executive  
02 May 2017