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# Modern Slavery Policy & Procedures

## Modern Slavery Statement

BPM Contracting Services is committed to the highest level of ethical standards and has zero tolerance to modern slavery and human trafficking and all forms of corruption and bribery directly and indirectly associated with these criminal acts.

We fully support the government's objectives to eradicate modern slavery and human trafficking.

We require all organisations within our supply chain to be accountable and transparent so that together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

Chris Kille

Managing Director

## Modern Slavery Code

- Local and national laws must be adhered to.
- Workers must be free to terminate their employment.
- Workers must have freedom of movement.
- Workers must have freedom of association.
- Threats of violence, harassment and intimidation are prohibited.
- Worker-paid recruitment fees are prohibited.
- Compulsory overtime is prohibited.
- Child labour is prohibited.
- Discrimination is prohibited.
- Confiscation of workers original identification documents is prohibited.
- Access to remedy, compensation and justice must be made available for victims of modern slavery.

## Ethical Procurement Procedure

- Identify the areas and regions of highest risk
- Analyse material routes individually
- Utilise a company-wide policy led by top management
- Identify all employees that will be affected by the policy and introduce training
- Engage with our supply chain to ensure that they understand the issues
- Use innovative software tools and cloud-based platforms to bring more transparency to the procurement process
- Seek out new ethically-based standards across the whole organisation
- Share information with peers regarding best practice from groups such as APRES and the Supply Chain School
- Support and pilot development of ethically-based standards

- Engage with raw material suppliers at the furthest reaches of the supply chain to develop collective action

## Worker Welfare Procedure

- Map out the supply chain and investigate relationships between agencies and suppliers
- Develop & regularly review a robust worker welfare policy that is central to operations.
- Ensure the entire company is held accountable
- Educate staff about modern slavery with tailored training and support at each level of the business
- Supervisors and managers must receive written notification that accepting inducements or any form of worker mistreatment, coercion or harassment will be regarded as a gross misconduct offence.
- Use independent parties to interview labourers
- Ensure that interviews are carried out in confidence, away from the worksite and without the participation of management
- Interview different nationalities
- Staff from Tier 1 contractors and clients should regularly engage with workers to build trust.
- Avoid tick-box mentality
- Ensure that:
  - Money is paid directly into bank accounts
  - All staff have a written contract (including agency workers)
  - Workers receive wage slips and are able to understand any deductions that are made.
  - Anonymous phone lines are set up for workers to report abuse
  - Employees have a safe forum to discuss and understand their rights.
  - A confidential grievance process is established that includes agency workers
  - Unauthorised deductions for food, accommodation or equipment are investigated.
  - Managers and site staff are given training to spot abuse and human rights violations.
  - Hours worked are monitored. Triggers are in place to investigate excessive overtime.
- Set long term strategy by referencing international guidance
- Pay all recruitment costs
- Move towards more transparent reporting
- Increase the amount of directly employed labour
- Minimise the number of tiers in the supply chain

## Breaches of the Modern Slavery Act

1. Investigate the non-conformance and describe it in full
2. Describe the root cause(s) of the non-conformance.
3. Describe the effects of the non-conformance

4. Describe for each cause what action(s) will be taken with the item and/or process i.e. training, process improvement, procedure revisions/design etc
5. Create an action identifying how each corrective action is to be achieved.
6. Review completion of the action plan to ensure it is being progressed according to schedule.
7. Once completed carry out an internal audit, revising the action plan if breaches are still identified, otherwise signing it off.

## **Procedure for Non-Compliant Suppliers**

Non-compliant suppliers must produce an action plan to improve performance. If the supplier fails to make progress against the plan, they are subject to review and sanctions, including potential termination.