

Modern Slavery Statement

Modern Slavery Statement

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015.

It sets out the steps taken by the Bowmer + Kirkland Ltd (B+K) and its subsidiaries (the Group) to prevent modern slavery and human trafficking in its business and supply chains for the year ending 31 December 2023.

B+K is committed to maintaining and improving our systems and processes to avoid complicity in human rights violations related to our own operations and that of our supply chain.

B+K recognises that labour exploitation, to include modern slavery and human trafficking, occurs in many forms. Our commitment to human rights is embedded within our culture and reflected within the Group policies and procedures. It is also reflected within our Code of Conduct.

B+K will strive to ensure that modern slavery and human trafficking is not taking place within our directly employed workforce or forming any part of our supply chain. We expect our suppliers to support our aims and as part of our conditions of working with us we include specific clauses that prohibit the use of forced compulsory or trafficked labour including anyone held in slavery or servitude.

During this reporting period B+K undertook a programme of activity which included:

- Reviewing and updating policies and procedures relating to modern slavery.
- Undertaking site and supplier visits as part of our due diligence programme.
- Updating our Code of Conduct for Suppliers to include modern slavery requirements.
- Enhancing our understanding of the labour agencies we use, to include developing a modern slavery questionnaire.
- Identifying high risk packages and the key suppliers in each one.
- Continuing to provide modern slavery training and awareness across the Group.
- Together with our suppliers, participating in the University of Liverpool / North West Construction Hub Positive Action on Modern Slavery Workshop.

This statement has been approved by the Board of Directors of Bowmer + Kirkland Ltd and signed by the Chairman J.A.C. Kirkland.

Structure, business and supply chains

The Bowmer + Kirkland Group is very much a family company. Our values, ethos and culture are moulded by the fact that we are family-owned. We focus on our customers and colleagues and part of our vision is to ensure that we continue to re-invest our resources into the Group.

Modern Slavery Statement (cont)

Founded in 1923, the Group now offers a wide range of specialisms through our construction division, handling projects from £1m to more than £130m, construction-related services companies and our homeland security subsidiaries.

B+K now has in excess of 1550 staff operating from our Head Office in Derbyshire, regional offices in Birmingham, Manchester, Motherwell, Newark, London, Reading and Sunderland and from offices in the USA.

We have regional construction teams able to adapt to changing markets and client requirements.

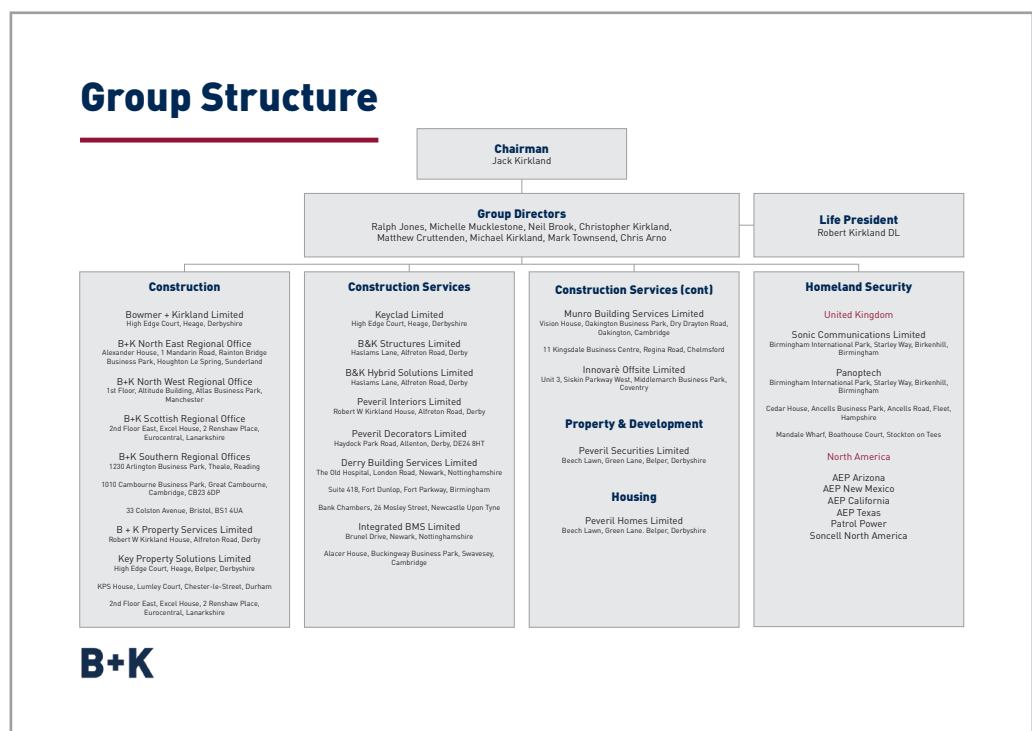
Although construction is a major part of our Group, we also offer construction-related services and have diversified into homeland security.

This statement is made for the Group. The Group Structure below is appended for reference.

Policies relevant to slavery and human trafficking

B+K operates a number of internal policies with a view to ensuring that it is conducting business in an ethical and transparent manner.

In addition to our Slavery and Human Trafficking Policy, other policies include our Recruitment Policy, Safeguarding Policy, Ethical Purchasing Policy, Social Value Policy, Sustainability Policy, Sustainability Procurement Policy, Training Policy and Whistleblowing and Disclosure in the Public Interest Policy.



Modern Slavery Statement (cont)

Due diligence and steps to assess and manage the risk of slavery and human trafficking in our business and supply chains

In respect of its own operations and directly employed workforce, B+K considers that the nature of its activities, the roles being performed and the recruitment processes it uses reduces the risk of all forms of labour exploitation slavery and human trafficking.

B+K undertakes “right to work” checks on all its employees prior to them commencing their role. This includes checking, where applicable, that the employee has a valid work visa and is of an appropriate age to work. All who are involved within the recruitment process have received training in relation to modern slavery.

B+K recognises that there is a risk of labour exploitation within its own supply chain for goods and services in addition to the projects it undertakes. Its projects rely, to varying degrees, upon the use of sub-contracting arrangements and agency labour, both of which are known to present risks.

The Code of Conduct for Suppliers sets out the B+K position in relation to slavery and human trafficking. We will conduct audits were considered appropriate within the supply chain for our own goods and services, along within the services we use within our operational activity. This includes targeted audits within areas of our supply chain considered to be at increased risk.

If there are any suspected cases of labour exploitation B+K will report these to the appropriate authorities.

Performance indicators

During 2024 B+K will undertake a risk assessment across the Group. This is to understand the level of risk across each subsidiary business and develop plans to address the areas of greatest risk. It will also provide a benchmark against which any reduction of risk can be measured.

In relation to key performance indicators for 2024 B+K will maintain records of:

- The number of group employees and suppliers who have completed modern slavery training and awareness.
- The number of supplier audits conducted.
- The number of suppliers attending our supplier days.
- The number of suppliers who have completed our modern slavery questionnaire.

Training

Modern slavery awareness and training is provided across the Group, including for all new starters.

The site induction material includes a section on modern slavery and is included within the site induction and orientation process.

Modern Slavery Statement (cont)

Through our partnership with the Supply Chain Sustainability School, we utilise its modern slavery resources for supplier awareness and training, focussing on high risk packages.

Responsibility for compliance

Overall responsibility for compliance with the Modern Slavery Act (2015) and the slavery and human trafficking policy is with the board of directors of B+K. The Group Business Development Director will be the lead role for the review and administration of the policy and statement.

Management at all levels, and in particular the Managing Directors for all divisions and subsidiary companies, are responsible for ensuring they understand and comply with this policy and are up to date with issues relating to modern slavery in supply chains.

Objectives for 2024

The objectives for 2024 are set out below.

- Continue with the modern slavery risk assessment for the Group to understand the level of risk across each business and develop plans to address the areas of greatest risk.
- Develop an audit programme taking into account the diverse nature of the Group, focussing on the areas seen as high risk.
- Issue questionnaires and conduct supplier audits in areas of highest risk (trades and sectors).

- Review the modern slavery training we provide to our employees and create a learning pathway for key roles.
- Include specific sessions in relation to modern slavery at our supplier events and track supplier modern slavery training via the Supply Chain Sustainability School.
- Evaluate and reduce the number of recruitment/labour agencies used .
- Keep a record of the Sub Sub-Contractors used and monitor them in relation to modern slavery.

Approval

This statement was approved by the Board of Directors of Bowmer + Kirkland Ltd

Signed:



J.A.C. Kirkland.

Dated: 31st January 2024