

Slavery & Human Trafficking Policy

Slavery & Human Trafficking Policy

Bowmer + Kirkland Ltd and its subsidiaries (the Group) is committed to upholding the human rights of our own and supplier workforce and to take steps to prevent slavery and human trafficking from taking place across our business. Our commitment to human rights is embedded within our culture and reflected within the Group policies and procedures.

We recognise that slavery and human trafficking, along with other forms of labour exploitation, occurs in many forms. We use the terms “slavery and human trafficking” to incorporate all forms of labour exploitation.

We will strive to ensure that slavery and human trafficking is not taking place within our directly employed workforce or forming any part of our supply chain. 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.

In addition to the legal requirements set out within the Modern Slavery Act 2025 we have also agreed to uphold The Athens Ethical Principles, which demonstrate our proactive commitment towards ending modern slavery and human trafficking by the year 2030.

Responsibilities for the Policy

Overall responsibility for compliance to this policy is with the Board of Directors of Bowmer + Kirkland Limited.

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.

Compliance with the Policy

We are committed to full compliance of this policy to avoid complicity in human rights violations, related to our both own operations and that of our supply chain. We aim to encourage openness in reporting if these matters and will support any member of staff throughout investigations raised in good faith. We will be equally supportive of any supplier who wishes to raise concerns.

We expect all of our suppliers to comply with our expectations and requirements for legal compliance, and to implement similar processes to ensure that their own workforce, whether directly employed, labour only contractors, labour supplied by an agency or through a subcontractor, are adhering to these standards.

Communicating our Policy

This policy will be made available on the website.

Slavery & Human Trafficking Policy (cont)

The Board of Directors and all of the Group's team will encourage anyone (including employees, sub-contractors, suppliers and clients) to report in good faith any issues or concerns regarding ethics, human rights, legal or regulatory violations, including improper or unethical business practices such as fraud, bribery and any concerns regarding slavery and human trafficking.

Any concerns by staff must be reported at the earliest possible stage through their line managers or reported in line with our grievance procedure and whistle blowing policy.

Reviewing and updating our Policy

We are committed to maintaining, reviewing and improving our systems and processes, to avoid complicity in human rights violations, related to our both own operations and that of our supply chain.

The Group Business Development Director will be the lead role for the review of this policy.

Awareness of this Policy

All staff are made aware of the policy and suitable information and training is provided to ensure a clear understanding of the issues relating to modern slavery within our business and the supply chains.

Within our supply chain the compliance with this policy is covered within our preconstruction meeting requirements and within both our terms of business and Codes of Conduct that are regularly audited both internally and externally.

Minimise Risk and monitor Progress on Modern Slavery

Our approach to minimise the risk of modern slavery is set out in our Modern Slavery Statement. This includes the processes for carrying out due diligence in the appointment of our staff and in the business transactions we undertake. It also includes our approach to continuous improvement and monitoring our performance in this area.

We will conduct audits were considered appropriate within our supply chain, along with the services we use within our operational activity, to meet this commitment to continuous improvement.

Breaches of this Policy

Any individual or business to be found in breach of this policy will face disciplinary actions.

Signed:



J A C Kirkland - Chairman
Date 31st January 2024