

Modern Slavery Statement

Modern Slavery Statement

Introduction

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

It sets out the steps taken by Bowmer and 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 2024.

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:

- Conducting a risk assessment to focus on areas within the Group considered to be at increased risk
- Undertaking 22 site and supplier visits following that risk assessment and as part of our due diligence programme
- Delivering modern slavery sessions at four regional supplier days, attended by over 400 delegates
- Delivering bespoke due diligence training and awareness to 33 suppliers considered to be working in areas of increased risk
- Training more than 950 employees on how to spot the signs and report modern slavery
- Updating our register of high-risk packages and the key suppliers in each one
- Participating in the Supply Chain Sustainability School Modern Slavery Leadership Group and other industry events

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. The Group now has more than 2,000 staff operating from our Head Office in Derbyshire, offices across the United Kingdom and in the USA.

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

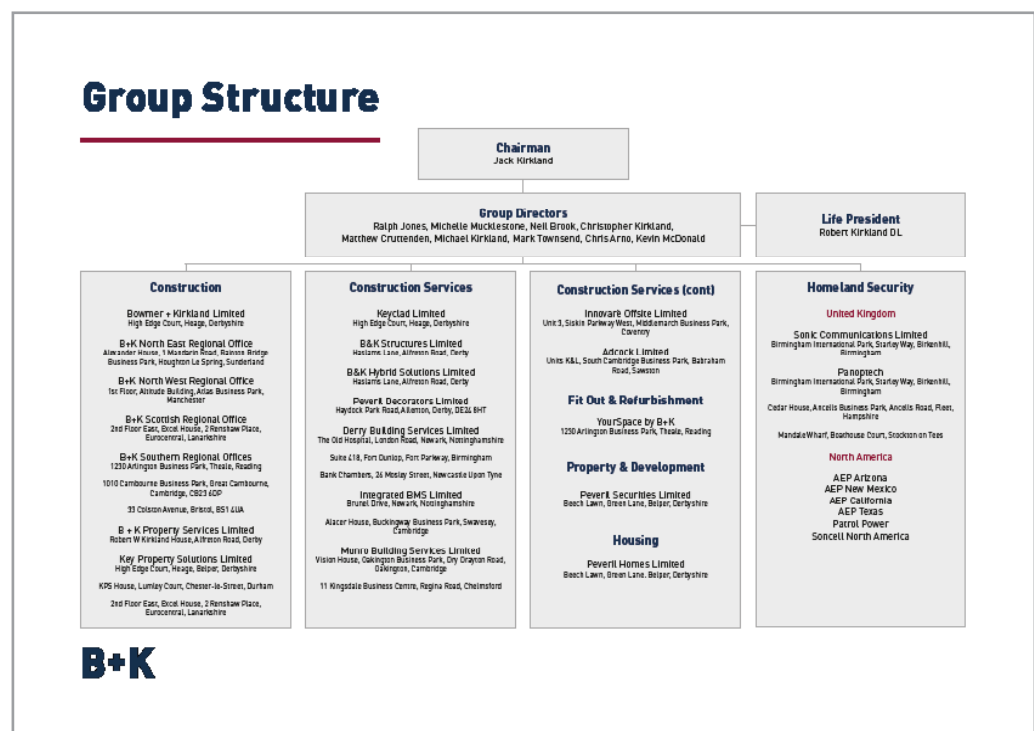
Although construction is a major part of our Group, we also offer construction-related services and have diversified into homeland security.

This statement is made for the Group, the structure is below 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 Modern Slavery 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 modern slavery. We will conduct audits where 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

In relation to key performance indicators for 2025, B+K will continue to maintain records of:

- The number of Group employees and suppliers who have completed modern slavery training and awareness
- The number of site visits undertaken
- The number of workers interviewed
- The number of supplier audits conducted

Training

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

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

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

Modern Slavery Statement (cont)

Responsibility for compliance

Overall responsibility for compliance with the Modern Slavery Act 2015 and the modern slavery policy is with the B+K Board of Directors.

The Group Social Value Manager has the lead role for the review and administration of the policy and statement.

Management at all levels, and in particular the Managing Director 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 2025

With the aim of building upon our modern slavery programme conducted over recent years the objectives for 2025 will be to:

- Continue the audit programme with site and supplier visits, following up with subcontractors on recommendations from past audits
- Evaluate and reduce the number of site labour agencies used
- Improve sub-subcontractor record keeping/monitoring via biometric systems
- Commence a risk assessment in relation to materials sourcing/manufacturing
- Review and communicate the internal escalation process
- Develop a modern slavery learning pathway for key roles.

Approval

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

Signed:

J.A.C. Kirkland.

Dated: 1st February 2025