



Anti-Slavery and Human Trafficking Policy Statement

This policy statement ensures that Buckingham Group Contracting Ltd (Buckingham Group) complies with section 54 of the Modern Slavery Act 2015, and sets out the responsibilities for Buckingham Group our employees, suppliers and subcontractors.

Buckingham Group Contracting Ltd is committed to ensuring that all of its business operations are free from involvement with slavery or human trafficking.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and, as reinforced by our Corporate Social Responsibility Policy Statement, we are committed to:

- Acting ethically, and with integrity, in all our business dealings and relationships
- Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains
- Provided suitable training to our staff and employees plus support and guidance to our Supply Chain Partners

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. To reinforce this statement our standard Terms and Conditions have been amended to embed these requirements on all of our contracts. Additionally, we have issued formal procedures and guidance, supported by appropriate training and coaching, to all of our personnel via our formal, third-party audited, management systems.

This policy:

- Applies to all persons working for us, or on our behalf, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners
- Does not form part of any employee's contract of employment and we may amend it at any time

Responsibility for the Policy

The Board of Directors, supported by all of our Senior Management Team, has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.



The Group Assurance and Compliance Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

All staff and employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Group Assurance and Compliance Manager.

Compliance with the Policy

This policy document will be made available to all employees who must ensure that it is read, understood and complied with at all times.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Guidance on these issues is provided to all employees in our formal ISO9001 Group Procedure 'GP.2014 Right to Work, National Minimum/Living Wage & Modern Slavery Act Compliance Checks'

If it is believed, or suspected, that a breach of this policy has occurred, or that it may occur, all employees, suppliers and subcontractors must notify their Line Manager, a Senior member of our Site Management Team or Buckingham Group Director OR report it in accordance with our Whistleblowing Policy and Grievance Procedures as soon as possible.

For the avoidance of doubt, all employees, suppliers and subcontractors:

- Are required to avoid any activity that might lead to, or suggest, a breach of this policy
- Are required to notify your Line/Senior Manager or Buckingham Group Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future
- Are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage

Where appropriate, and with welfare and safety for all as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your Line Manager, a Senior member of our Site Management Team or Buckingham Group Director or, as stated above, in accordance with our Whistleblowing Policy.

We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your Line Manager or Buckingham Group Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our existing Grievance Procedure, which can be found within our Integrated Business Management System / Group Procedures/ GP.HR4003 Grievance.



Communication and Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains:

- Forms part of the induction process for all individuals who work for us
- Has been provided to all of our Senior Managers and is embedded within a rolling training programme (Monitored by our HR/Training Team) that is provided for every employee
- Is further enhanced by the coaching and training provided to our personnel in the correct application of our formal ISO9001 Group Procedure 'GP.2014 Right to Work, National Minimum/Living Wage & Modern Slavery Act Compliance Checks'
- Will be provided for specific projects/locations if identified as High Risk during the pre-construction/construction risk assessment process

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. We will ensure that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act.

Annual statement

Buckingham Group Contracting Ltd will publish an annual slavery and human trafficking statement. A link to this statement will be on the homepage of our website and it will be signed and approved by Mr. M. T. Kempley; Managing Director.

Mr. Andrew Scott; Business Development Director, has been nominated by the Board of Directors with the responsibility for ensuring that this statement is published and reviewed on an annual basis.

The statement will explain the steps that Buckingham Group Contracting Ltd has taken to ensure that slavery and trafficking are not taking place in any of our supply chains, or in any part of our own business.

The following items will be included in the statement:

- The structure of:
 - Our organisation
 - Our business operations
 - Our supply chains
- Our policies in relation to slavery and human trafficking.
- The due diligence processes that we carry out to ensure that there is no slavery or human trafficking in our business and supply chains
- Identification of any parts of our business and supply chains where there is a risk of slavery or human trafficking take place, and the steps that we have taken to assess and manage the risk particularly in high risk areas
- An assessment of the effectiveness of the measures that we have taken to stop slavery and human trafficking taking place, and the way that we assess and manage the risks that are identified
- A statement that training about slavery and human trafficking is available to all employees

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which can result in dismissal for misconduct or gross misconduct. In support of our zero-tolerance approach we will, if as a result of



investigation, it is deemed appropriate, terminate our relationship with any individuals and organisations working on our behalf if they breach this policy.

Monitoring, Auditing and Review

This policy will be reviewed annually to coincide with the preparation and publication of the Annual Statement and at other intervals that may be required following:

- Further changes in the published, or similar aligned, legislation
- As a result of issues raised by regular audits
- Following any investigation into issues or concerns raised by our staff, employees, subcontractors, suppliers plus other interested third parties
- The results of monitoring, audit and review of our existing aligned policies and our formal ISO9001 Group Procedure 'GP.2014 Right to Work, National Minimum/Living Wage & Modern Slavery Act Compliance Checks'

Signed:

Dated: 5th March 2019

Signature redacted for security purposes

Mr. M. T. Kempley; Managing Director