

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

This policy applies to all persons employed by Business Control Solutions Plc (the Company), including all full-time and part-time employees, contractors and any employees undertaking work experience with the Company (collectively, 'workers'). For the purposes of this policy, a 'contractor' describes a worker who provides their services to the Company via an intermediary.

Policy Statement

Modern Slavery, Human Trafficking & Child Labour

Modern slavery encompasses exercising ownership over a person (slavery), imposing an obligation on a person via coercion (servitude) and forced or compulsory labour. Human trafficking involves arranging or expediting the travel of a person with the intent of exploiting them. Child labour involves the exploitation of children through any form of work that deprives them of their childhood and is physically or mentally harmful.

The Company does not fall within the scope of the Modern Slavery Act 2015 (the Act) but strictly prohibits the use of modern slavery, human trafficking and child labour in its operations. It has and will remain committed to implementing systems and controls aimed at ensuring that modern slavery, human trafficking or child labour is not taking place within the organisation. Having conducted a risk assessment of the Company's suppliers, it was determined that the level of risk was low and therefore the Company shall prioritise its efforts towards workers directly involved in the provision of services.

Commitments

The Company always endeavours to operate responsibly, ethically and in full compliance with UK legislation through the discharge of internal policies and procedures.

Our Employees

The Company strives to maintain high standards of ethical conduct and ensure the fair treatment of all workers throughout the organisation. The Company is committed to providing a safe working environment and ensuring the safety and wellbeing of all workers.

The Company is proud to be an accredited [Living Wage Employer](#), offering all workers a voluntary rate of pay over and above legal requirements which is calculated according to the basic cost of living in the UK. Furthermore, all contractors and direct employees of the Company undergo thorough pre-employment screening to ensure compliance with UK labour laws. No individuals under the age of 16 are employed by or permitted to work for the Company.

As part of the Company's commitment, all persons working for or on behalf of the Company are expected to support and uphold the below measures to safeguard against modern slavery and human trafficking:

- Demonstrate a zero-tolerance approach to modern slavery within the Company and its supply chain.
- Prevent, detect and report any case of modern slavery within the organisation or supply chain.
- Engage with relevant stakeholders and suppliers to address the risk of modern slavery in the Company's operations and supply chain and set the expectation that suppliers are holding their own suppliers to equally high standards.
- Adopt a risk-based approach:
 - during the Company's commercial processes when assessing third parties to determine whether the inclusion of specific contractual prohibitions against the use of modern slavery and trafficked labour are required;
 - whilst assessing the benefits of writing to suppliers requiring them to adopt the Company's approach towards anti-slavery and human trafficking; and
 - when engaging with employment and recruitment agencies to confirm their compliance with the Company's approach.
- Conduct risk assessments and appropriate due diligence processes during which it will be considered
- Where circumstances warrant, carrying out audits of suppliers.
- Take appropriate action as soon as the Company is aware that individuals or organisations working on the Company's behalf have breached this policy.

Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

Our Suppliers

The Company's supplier relationships are low risk and typically involve the procurement of goods or services for internal use only, such as technology and office supplies.

The Company aims to mitigate risks when selecting and contracting with suppliers through various actions, including:

- Requiring suppliers of regularly contracted staff to confirm their workers receive the [Living Wage](#).
- Providing educational awareness on issues relating to slavery and human trafficking to workers who directly engage with suppliers, thus helping them identify potential issues when dealing with suppliers.
- Requesting potential suppliers to provide their current anti-slavery and human trafficking policy and, where applicable, requesting confirmation of their compliance with the Act.
- Including, in standard supplier contractual templates, a clause regarding the prevention of slavery and trafficked labour.
- Conducting risk assessments of the Company's supplier base to determine any high-risk suppliers and those which fall within the scope of the Act.