

## Modern Slavery Statement 2016-2017

Britcon (UK) Limited – Company Registration Number 2463833

MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR 2016-2017 ISSUED PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015

### OUR BUSINESS, STRUCTURE AND SUPPLY CHAINS

Britcon provides building, civil engineering and steelwork solutions for the built environment. Established in 1990 as a family business with exceptional credentials, Britcon is a trusted partner delivering safe, innovative and value driven solutions. Our work takes place within the UK with operating bases at Scunthorpe, North Lincolnshire and Wakefield, West Yorkshire.

Britcon is proud of the ethical standards that we have embedded into its business over many years and believes that these standards are consistent with the underlying principles of the Modern Slavery Act 2015. Slavery and the trafficking of people have no place in the modern world.

Modern slavery is an international crime and violates human rights. This problem transcends age, gender, gender reassignment, disability and ethnicities. It takes many 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.

The purpose of this policy is provide information and guidance to all persons working for Britcon in any capacity on how the company deals with modern slavery and the role that all individuals involved with our business must play in ensuring compliance with the Act.

Britcon is committed to ensuring, so far as we are able, that there is no modern slavery or human trafficking in our supply chains or in any part of our business and we take a zero-tolerance approach to slavery and human trafficking. Our supply chains include sub-contractors, suppliers, labour agencies and professional services providers. Our Anti-Slavery and Human Trafficking Policy reflects a long-standing commitment to acting ethically and with integrity in all of our business relationships, supported by the development and implementation of effective systems and controls.

We directly employ around 110 individuals throughout the UK within the construction sector, operating primarily within the commercial, industrial, transport, education, retail, waste and infrastructure sectors, together with a Lincolnshire based manufacturing plant. Our turnover is excess of £36million and as such ensure compliance with the 2015 Modern Slavery Act.

### High Risk

We have reviewed our exposure to risk of Modern Slavery across all aspects of our business, and focus risk assessments on three key areas:-

- Direct, agency and temporary employment practices including temporary and agency

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employment, for example at Britcon sites and within our manufacturing facility.

- Subcontractor relationships, where we consider employment and payment practices.
- Supply Chain, where we assess risk based on geography, material or component type and our relationship with the supplier.

### **Direct, Temporary and Agency Employment Practices**

All of our direct employees are paid in accordance with UK legislation and this is kept under review.

We expect all agency providers to be able to satisfy us that staff all have written employment contracts, have not had to pay for the opportunity to work, and are legally able to work within the UK. Within the tender process we will be taking consideration of the agency's ability to respond to our requests for compliance.

### **Subcontractors**

All our subcontractors have been informed of our expectations on modern slavery, and revisions have been made to our prequalification and review procedures.

### **Supply Chain**

Britcon is committed to ensuring our suppliers adhere to the highest standards of ethics, and that all supply chain partners have completed our rigorous prequalification and approval processes.

Part of this process will require supply chain partners to demonstrate steps taken to ensure slavery and trafficking is not taking part in any part of their business. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Britcon works with suppliers, within the period of selection, pre-construction and onsite construction ensuring they meet the standards of the code and improve their worker's working conditions if necessary.

### **Whistleblowing**

Employees, sub-contractors or suppliers who become aware of possible improper, unethical or even illegal behaviour are to raise the matter with their manager or alternatively refer the matter to our human resources administrator.

### **Policy**

The Human Resources Department in association with the Business Development Department are responsible for putting in place and reviewing policies and the process by which they were developed, under the authorization and agreement of the board of directors.

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## OUR POLICIES

Britcon has adopted the following policies relevant to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

Examples of relevant policies:

- Responsible Sourcing Policy
- Human Rights Policy
- Environmental Policy
- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- Health and Safety Policy
- CSR Policy
- Employee Code of Conduct
- Supplier Code of Conduct
- Recruitment/Agency workers policy

## DUE DILIGENCE PROCESSES

Due diligence activities to combat Modern Slavery and Human Trafficking, described below, are risk based and will in future correspond with the level of risk identified. As such, we are constantly reviewing risk through supply chain assessment.

In order to seek to prevent Modern Slavery and Human Trafficking in our business and supply chains we have begun a due diligence process which has identified the need to introduce specific questions relating to Modern Slavery and Human Trafficking during the pre-qualification and annual review of our supply-chain and sub-contractors.

In addition, checks will also be carried out during annual sub-contractor business reviews to ensure continued compliance is achieved and to monitor the effectiveness of the activities put in place. For all directly employed employees we carry out Right To Work in the UK checks.

## Communication

Britcon believes that modern slavery violates fundamental human rights and are committed in ensuring that this is does not take place within our company.

In adhering to this policy, Britcon will:-

- Include, as part of our contracting processes, obligations to ensure compliance with the requirements of the Modern Slavery Act 2015.
- Encourage openness and provide support to anyone who raises genuine concerns in good faith in relation to this policy, even if they turn out to be mistaken. Britcon are committed to ensuring that no one suffers any unfair treatment as a result of reporting suspicions that modern slavery in whatever form is, or may be, taking place in any part of our own business or in the

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businesses of any of our supply chains.

- Communicate our zero-tolerance approach to modern slavery with our supply chain and business partners at the outset of our business relationship with them.

### **Training and Raising Awareness**

As well as training staff, Britcon will raise further awareness of modern slavery issues by distributing flyers/putting up 'Stronger Together' posters across the organisation's premises both at our operating centres and site offices, as well as on the company website.

The communication materials will explain to staff:-

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within Britcon

### **Board Approval**

With these Procedures in place, we are satisfied that Britcon is taking appropriate steps to ensure that slavery and human trafficking is not taking place in any parts of our business or supply chain. Britcon will monitor the effectiveness of the steps we are taking on an on-going basis and will report on any relevant additional steps in our next annual statement under the Modern Slavery and Human Trafficking Act.

This statement has been approved by our Company's Board who will review, update and publish this statement annually.

Approved by the Board on 01/03/2017 and signed on its behalf by:



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Paul Clarkson – Managing Director

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