

## **Modern Slavery Statement - British Engineering Services TopCo Limited**

### **Introduction**

This statement covers the activities of British Engineering Services TopCo Limited and its subsidiaries (including British Engineering Services Limited) and sets out the actions the Group is taking to understand all potential modern slavery risks related to its businesses and the steps it is taking to ensure there is no slavery or human trafficking in its businesses and supply chains.

The Company is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring its supply chains are free from slavery and human trafficking.

This statement relates to actions and activities during the financial year ended 31 December 2017.

### **Our Structure**

We are an Engineering Testing, Inspection and Certification business. We employ over 400 highly trained and qualified Engineer Surveyors and Certification Engineers and approximately 150 head office support staff, all based primarily in the UK. We also have a small number of employees in the Republic of Ireland, Channel Islands and The Isle of Man.

### **Supply Chain**

The majority of our suppliers are UK based however we recognise that their supply chains may extend beyond the UK presenting a different level of risk.

Our supply chain includes approximately 300 suppliers of varying size and expertise including services, and material supply.

### **Responsibility**

Responsibility for the Company's anti-slavery initiatives is as follows:

- HR Director - Employment policies, vetting of candidates and employee awareness / training
- CFO - Supply chain policies, vetting & monitoring
- Quality Assurance Manager – Risk assessment
- Chief Risk Officer – Oversight of risk assessment & internal assurance

### **Processes and Due Diligence**

We are committed to implementing and maintaining effective systems and controls to prevent, detect and eradicate modern slavery within our business and that of our suppliers:

1. Annual risk assessment to identify key vulnerabilities and an ethical approach to procurement.
2. For new suppliers and renewals of existing contracts, we include contractual provisions to ensure our suppliers understand the company's approach to modern slavery in supply chains.

**May 2018**

3. The company encourages all its employees to report any concerns related to its direct activities or supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation.
4. We are assessed and audited annually by Achilles (external auditors). This enables us to ensure compliance with legal requirements and best practice in respect of management of our supply chain.
5. The company undertakes due diligence when considering appointing new and existing key suppliers which include those identified in our risk assessment. Key suppliers are put through a screening process to check they meet our ethical standards and values. We conduct regular reviews of our existing suppliers.
6. Awareness Training: Policy and relevant website links distributed to all employees with responsibility for recruitment and purchasing in order to raise awareness and respond to any slavery and, or human trafficking risks.
7. Recruitment/Agency Workers Policy. The company uses only specified, reputable employment agencies to source labour and verifies the practices of any new agency it is using before accepting workers from that agency.

### **Progress made in Previous 12 Months**

- Progress reported to our Executive Team and Board.
- Training developed and delivered to all appropriate individuals, targeting those areas of the business which were identified as posing the greatest risk from a slavery or human trafficking perspective.
- Took steps to further develop our supply chain vetting processes in line with our commitment to continuous improvement. Completed audits of our key suppliers, and / or those identified in the risk assessment.
- Risk assessment of supply chain completed.
- Benchmarked our activities against statements and action plans undertaken by similar organisations.
- In tender processes, we now ensure prequalification criteria of suppliers incorporates a requirement to confirm compliance with the Act together with the requirement to maintain a Modern Slavery Act Statement.
- Communication issued to our key suppliers advising them of our commitment to ensuring that modern slavery is not taking place within our business or supply chain and setting out our expectations that they hold the same high standards. We fully expect that our suppliers will share our zero tolerance approach and will hold their own suppliers to the same high standards.
- Publication of an article in the Company's internal newsletter to all employees raising awareness of modern slavery issues and providing a link to our statement and the government's guide: Transparency in Supply Chains.

### **Further Steps To Be Undertaken in 2018**

- Continue to build upon actions and improvements made in prior year.
- Refresher training for recruitment and supply chain managers.
- Communicate our updated statement to all employees via internal comms to continue to promote awareness.

### **Training**

The organisation requires all supply chain managers and HR professionals within the Company to confirm they have read and understood the Company's policy statement on Modern Slavery and the following guide: [Transparency in Supply Chains etc: a practical guide](#) as part of their continuous professional development and to comply with our policy commitment.

### **Awareness Programme**

As well as training relevant employees, the Company raises awareness of modern slavery issues by publishing its statement on the Company's Home Page of its intranet and its external website.

### **Board Approval**

This statement has been approved by the CEO, CRO and HRD, who will review and ensure it is updated annually.

Signed:



Stewart Kay  
Group CEO

