

Modern Slavery Statement 2016 - British Engineering Services

Introduction

British Engineering Services 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 sets out the actions the Company is taking to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in its own business and its supply chains.

This statement relates to actions and activities during the financial year 1 November 2015 to 31 December 2016.

Our Structure

British Engineering Services is an Engineering Testing, Inspection and Certification business. Until recently, our business was part of RSA, one of the world's leading insurance groups and a FTSE 100. In 2015 we became established once more as an independent and privately owned company.

Today we employ over 450 highly trained and qualified Engineer Surveyors and Certification Engineers and approximately 100 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 recognize that their supply chain may extend beyond the UK presenting a different level of risk.

Our supply chain includes approximately 280 suppliers of varying size and expertise including services, and material supply.

Responsibility

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

- o HR Director Employment policies, vetting of candidates and employee awareness / training
- Head of Procurement Supply chain policies, vetting & monitoring
- Internal Auditor Internal assurance
- Quality Assurance Manager Risk assessment
- Chief Risk Officer Oversight of risk assessment

Existing Processes and Due Diligence

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



- 1. Completion of a risk assessment to identify key vulnerabilities and taking 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.
- 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 will 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.

Further Steps to be Undertaken in Year 2

- Report progress to our Executive Team and Board.
- Training will be developed and delivered to all appropriate individuals, targeting those areas of the business which we identify as posing the greatest risk from a slavery or human trafficking perspective.
- Further develop our supply chain vetting processes in line with our commitment to continuous improvement. We
 will undertake independent audits of our key suppliers, and / or those identified in the risk assessment. We fully
 expect that all of or supply chain will share our zero tolerance approach and will hold their own suppliers to the
 same high standards.
- Reviewing progress against actions identified in our annual risk assessment.
- Continue to benchmark our activities against statements and action plans undertaken by similar organisations.
- In future tender processes, we will ensure prequalification of suppliers incorporates a requirement for tenderes / bidders to confirm compliance with the Act together with the requirement to maintain a Modern Slavery Act Statement.
- We will issue a communication to our regular 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 follow the same high standards.



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:

<u>Transparency in supply chains etc: a practical guide</u> 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 Company's board of directors, who will review and ensure it's updated annually.

Director's Signature:

Date: 31 January 2017