

Barton & Redman Ltd

**Modern Slavery Act 2015 Policy Statement**

*This policy applies to all individuals working for Barton & Redman Ltd or on the company's behalf in any capacity, including directors, PAYE employees, self-employed and agency workers.*

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.

Barton & Redman Ltd has a zero-tolerance approach to modern slavery and we are committed to acting ethically with integrity and transparency in all our business dealings and relationships, and to enforcing and implementing effective systems and controls. This is to ensure that modern slavery is not taking place anywhere either within our own business or in any of our supply chains, consistent with our obligations under the Modern Slavery Act 2015.

We acknowledge that the COVID-19 pandemic has brought challenges that may increase the risk of modern slavery in supply chains, though following a review we do not consider this has impacted our supply chains.

Barton & Redman Ltd also expect the same high standards from all of our suppliers, and that our suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example: poor working practices and lack of health and safety awareness, instances of human trafficking, slavery of forced labour in a work environment. In addition, may go to great lengths to hide the fact they are using slave labour.

However, Barton & Redman Ltd accepts that we have a responsibility through our risk assessment and due diligence processes to ensure that workers are not being exploited, that they are safe and that the relevant Employment, Health and Safety and Human Rights laws and standards are being adhered to, including freedom of movement and communications.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide briefings to our Directors and employees.

Compliance

The prevention, detection and reporting of modern slavery in any part of the Barton & Redman Ltd business or supply chains, whether in the UK or abroad, is the responsibility of all those working for Barton & Redman Ltd or under the control of Barton & Redman Ltd.

You are required to avoid any activity that might lead to the breach of this policy.

If you believe or suspect a breach of conflict documented in this policy has occurred, or may occur you MUST notify your line manager or a member of the HR department. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Barton & Redman Ltd business or supply chains. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Barton & Redman supply chains constitutes any of the various forms of modern slavery, please raise your concerns with your Line Manager.

You can also contact the government Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

Barton & Redman Ltd aim to encourage openness and inclusivity and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Barton & Redman Ltd is committed to ensuring no one suffers any detrimental treatment or victimisation, as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of our business or supply chains.

#### Breach of this policy

Barton & Redman Ltd may terminate its commercial relationship with suppliers if they breach this policy and/or are found to have been involved in modern slavery.

Signed by



Mr Paul Barton

Director

Barton & Redman Ltd

20<sup>th</sup> March 2021

*(The financial year for Barton & Redman Ltd comes to an end on 31<sup>st</sup> October)*