

# Modern Slavery Policy

JANUARY 2019

---

Prepared by	Reviewed by	Authorised by	Document No.	Date	Revision
Angeline Barnes Head of HR	Angeline Barnes Head of HR	Angeline Barnes Head of HR	IMS4325	January 2019	1

The Modern Slavery Act 2015 requires commercial organisations supplying goods or services with a turnover of above £36 million to prepare and publish an annual 'Slavery and Human Trafficking Statement'. The Statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its supply chain.

## **What is Modern Slavery?**

Modern Slavery is an international crime, affecting an estimated 29.8 million slaves around the world. It is a growing global issue that transcends age, gender and ethnicities. It includes victims who have been brought from overseas and vulnerable people in the UK, who are forced to illegally work against their will across many different sectors such as agriculture, hospitality, construction, retail and manufacturing.

## **Our policy**

We are working towards establishing a zero-tolerance position on violations of anti-human trafficking and anti-modern slavery laws. If we find breaches of these laws within our supply chain, we will look to support companies in their efforts to comply with the legislation. We will also actively consider how we support or conduct business with organisations involved in slavery, human trafficking, forced or child labour.

Our Values: Collaboration, Leadership, Excellence, Agility, Respect, and Responsibility underpin our culture and how we do business. They are embedded throughout our business and set the parameters for how we expect people to behave with their colleagues, clients and the world at large. We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values.

## **Our structure and supply chains**

Bauder Limited in the UK and Ireland is a daughter Company of Bauder GMBH forming one of 13 group of Bauder Companies situated throughout Europe, with over 900 direct employees. Each of the Bauder Groups operate as a separate legal entity; they are not a worldwide partnership. This statement relates to the UK entity, its structure and supply chain.

## **Our procedures**

We have a number of procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chains.

### *Employment:*

Robust recruitment processes in line with UK employment laws, including: 'right to work' document checks; contracts of employment and checks to ensure everyone employed is 16 and above.

Market-related pay and reward, which is reviewed annually and linked to professional benchmarks.

An enhanced benefits package, providing additional health and welfare options to support our employees (and their families) lifestyle choices.

### **Transparency in our supply chains:**

We recognise our business is exposed to greater risk when dealing with suppliers, particularly those who have operations/suppliers in other territories.

We have mapped our supply chain and have identified over 400 suppliers for the financial year 2017 with a combined spend of over £35 million. We have then focused on key suppliers with spend over £100,000 (making up 90% of our annual supplier spend), which have been mapped according to location, size and industry to identify levels of risk.

Of these:

81% (29% of spend) are located within the UK and 19% (72% of spend) in other low risk countries, with no key suppliers based in territories which we consider to be high risk.

8% of key suppliers with UK operations we believe have an annual turnover of >£36m, and are therefore covered by the Modern Slavery Act requirements.

8% of key suppliers are companies we consider to be operating in high-risk sectors.

We collaborate closely with our key suppliers, taking reasonable steps where required, to helping them understand and work towards their own obligations under the Modern Slavery Act. Our own key supplier agreements (used for key strategic suppliers) have been updated to include a commitment to comply with modern slavery legislation, with termination specified as likely outcome of any breach.

### **Employee training:**

We want to help our people to understand more about this growing issue and how to report any suspicions they may have, whether in a business or personal context.

We have in place a whistleblowing policy 'Speak out' which ensures that anyone who has concerns, for example, about how our suppliers or staff are behaving, has a means of raising their concerns confidentially. We encourage anyone to report any suspicions they may have regarding modern slavery. Hence why our Modern Slavery Statement is contained within our Employee Handbook in order to raise awareness.

### **Looking forward: key performance indicators**

Going forward, we aim to work towards:

Developing an employee training module. This training will outline what modern slavery is, how to identify it and what individuals should do if they suspect there are any cases of slavery occurring.

Developing a procedure to monitor how our suppliers comply with our supplier Code of Conduct.