

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Purpose

BMP Europe Ltd is committed to conducting all business activities ethically, responsibly and with integrity. The purpose of this policy is to set out the Company's commitment to preventing modern slavery, forced labour, servitude and human trafficking within its operations and supply chains and to establish clear responsibilities for identifying, reporting and managing related risks.

BMP Europe Ltd has a zero-tolerance approach to modern slavery and is committed to acting promptly and appropriately where concerns are identified.

Scope

This policy applies to all individuals working for or on behalf of BMP Europe Ltd, including:

- Employees at all levels
- Directors and senior managers
- Agency and temporary workers
- Apprentices and trainees
- Contractors and consultants
- Volunteers
- Suppliers and subcontractors
- Business partners and third-party representatives
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All persons covered by this policy are expected to comply with its requirements.

Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It can take many forms including slavery, servitude, forced or compulsory labour, debt bondage, child labour and human trafficking. These activities deprive individuals of their freedom and exploit them for personal or commercial gain.

BMP Europe Ltd is committed to:

- Complying with the Modern Slavery Act 2015 and all applicable legislation.
- Operating transparent and ethical business practices.
- Taking reasonable and proportionate steps to prevent modern slavery within the Company and its supply chains.
- Promoting a culture in which concerns can be raised without fear of retaliation.
- Working with suppliers and business partners who share our commitment to ethical labour practices and human rights.

Responsibilities

Managing Director and Senior Management Team

The Managing Director and Senior Management Team have overall responsibility for ensuring this policy is implemented, maintained and reviewed.

Responsibilities include:

- Promoting ethical business conduct.
- Ensuring adequate resources are available to implement this policy.
- Reviewing significant modern slavery risks and concerns.
- Ensuring compliance with applicable legislation.

Management Team

Managers are responsible for:

- Ensuring employees understand and comply with this policy.
- Encouraging concerns to be reported promptly.
- Investigating concerns appropriately and confidentially.
- Supporting awareness and training activities where required.

Employees and Workers

All employees and workers are responsible for:

- Reading and complying with this policy.
- Remaining vigilant to signs of modern slavery.
- Reporting concerns promptly.
- Cooperating with any investigation relating to suspected breaches.

Supplier and Supply Chain Expectations

BMP Europe Ltd expects all suppliers, contractors and business partners to operate in a lawful, ethical and responsible manner.

Suppliers are expected to:

- Comply with applicable employment and human rights legislation.
- Prohibit the use of forced, bonded, compulsory or trafficked labour.
- Ensure workers are employed voluntarily and can leave employment in accordance with applicable contractual and legal requirements.
- Provide fair remuneration and lawful working conditions.
- Prevent child labour in their operations.
- Take reasonable steps to identify and manage risks within their own supply chains.
- Cooperate with reasonable requests for information relating to modern slavery compliance.

BMP Europe Ltd reserves the right to assess and review suppliers where appropriate to ensure compliance with these expectations.

Due Diligence and Risk Assessment

BMP Europe Ltd will take proportionate and risk-based steps to identify and assess potential modern slavery risks within its operations and supply chains.

These measures may include:

- Supplier approval and review processes.
- Assessment of supplier performance and ethical standards.
- Contractual requirements relating to legal and ethical compliance.
- Investigation of reported concerns.
- Review of higher-risk suppliers, contractors or activities where appropriate.

Where risks are identified, appropriate corrective actions will be implemented and monitored.

Reporting Concerns

The prevention, detection and reporting of modern slavery is the responsibility of everyone working for or on behalf of BMP Europe Ltd.

Any individual who knows of, suspects or witnesses conduct that may indicate modern slavery must report the concern as soon as practicable to:

- Their Line Manager;
- A member of the Management Team; or
- The HR Department.

Examples of warning signs may include:

- Workers appearing fearful, intimidated or controlled.
- Restrictions on freedom of movement.
- Workers being unable to retain personal identification documents.
- Evidence of coercion, threats or exploitation.
- Excessive working hours or unlawful deductions from pay.

Where an individual feels unable to raise a concern through normal management channels, concerns may be raised through the Company's Whistleblowing Policy.

Protection for Those Raising Concerns

BMP Europe Ltd is committed to promoting a culture of openness and transparency.

Any person who raises a genuine concern in good faith will be supported and protected from retaliation, victimisation or detrimental treatment, regardless of whether the concern is ultimately substantiated.

Detrimental treatment may include:

- Dismissal
- Disciplinary action
- Threats or intimidation
- Harassment
- Unfavourable treatment connected with reporting a concern

Any individual who believes they have suffered detrimental treatment should raise the matter through the Company's Grievance Procedure or with the HR Department.

Training and Awareness

Appropriate information and awareness relating to modern slavery will be provided to employees as part of the induction process and periodically thereafter where relevant.

BMP Europe Ltd will seek to ensure that managers, employees involved in recruitment, supplier management and procurement activities understand the risks of modern slavery and their responsibilities under this policy.

Communication

This policy will be:

- Made available to all employees.
- Included within the Employee Handbook.
- Communicated during employee induction.
- Made available to suppliers, contractors and business partners upon request.
- Reviewed and communicated following any significant changes.

Breaches of this Policy

Any employee who breaches this policy may be subject to disciplinary action, up to and including dismissal for gross misconduct.

BMP Europe Ltd reserves the right to suspend, terminate or decline to renew relationships with suppliers, contractors, consultants, agency workers or business partners where there is evidence of modern slavery, human trafficking or a failure to cooperate with reasonable due diligence activities.

Related Documents

This policy should be read alongside:

- Employee Handbook
- Whistleblowing Policy
- Grievance Procedure
- Disciplinary Procedure
- Supplier Approval and Evaluation Process

Review and Monitoring

The effectiveness of this policy will be reviewed periodically by the Management Team. This policy will be formally reviewed at least annually, or sooner where there are:

- Changes in legislation;
- Significant organisational changes;
- Identified modern slavery risks; or
- Findings from audits, investigations or stakeholder feedback.