

Modern Slavery Policy Statement – Bower Fuller

Slavery and human trafficking are abuses of a person's freedoms/rights and we are committed to eliminate acts of modern slavery from within our business and that from within our supply chains. The Company acknowledges responsibility under the Modern Slavery Act 2015 and will work towards ensuring transparency within the organisation and with suppliers of goods and services to the Company.

For our financial year ending September 2023 we did not encounter any modern slavery issues in our business.

This statement sets out the steps that we, Bower Fuller, have taken to ensure that slavery and human trafficking do not take place in our business or any of our supply chains. This statement is part of our Employee Handbook and referenced on our web site.

Company Structure and Business

Bower Fuller, is a trading division of The Barnes Group Limited, dealing with mechanical and electrical projects, employing approximately 81 staff; we are a family-run organisation. The Head Office is based in Ipswich, Suffolk, with an additional office in Dartford.

We use several sub-contractors and agency workers.

The Barnes Group Limited have an annual turnover in excess of £36m and operate solely in the UK.

Our Supply Chains

Bower Fuller use predominantly local supply chains within the UK for the supply of materials and labour. Our suppliers and subcontractors are responsible for compliance with their supplier relationships.

We source some of our materials and services from abroad, however the vast majority is sourced via our local supply and subcontractor chains.

Relevant Policies

We will always aim to act with integrity across all our business dealings, some of our existing policies are relevant to ensure that there is no slavery or human trafficking involved in any part of our business or supply chains.

Our relevant policies include:

- Protected Disclosure or Whistleblowing
- Equal Opportunity and Diversity Policy
- Corporate Social Responsibility Policy
- Anti-Harassment and Bullying Statement and Procedure

Risk Assessment and Due Diligence Processes

Prior to taking on a new member of staff we complete the necessary pre-employment checks to verify the workers' identity and eligibility to work in the UK. We would not employ those who are unable to provide us with such evidence. The recruitment agencies we use are required to make the same checks before supplying a worker to us.

All our employees are paid by bank transfer and we don't make payments into third party bank accounts thus minimising the risk of forced or compulsory labour.

If we became aware of any potential issue with our staff, agency workers or sub-contractors we would investigate and if our concerns were founded immediately report to the police on 101. If a person was in danger, we would immediately ring 999.

We operate under ISO 9001, ISO 14001 and ISO 45001.

Subcontractors Adherence to Our Commitment

We have zero tolerance to slavery and human trafficking, and we expect all our subcontractors, suppliers and consultants to adhere to our commitment. All sub-contractors and consultants are required to undergo a prequalification check before they are approved and placed on our database and potentially asked to tender for work. As part of these checks we will ensure that they are made aware of the importance of this policy statement and our zero tolerance on modern slavery. Our Subcontractors are responsible for compliance with their supplier relationships.

Our sub-contract conditions have been updated to include a clause to terminate the sub-contractor's employment with immediate effect for any contravention of the Modern Slavery Act by them or their supply chain.

Training

Our existing employees are made aware of the importance of ensuring that the Company is alert to the potential of slavery and human trafficking via this statement being issued and highlighted within the Employee Handbook. All new employees will be made aware during their Company Induction.

We also raise awareness across our business through our HR team who deliver a modern slavery awareness presentation to our engineers and site foremen. This enables our own employees to be more aware and observant on whichever site they are working.

Measurement of Effectiveness

We do not have key performance indicators specifically in relation to slavery or human trafficking as any instance would be expected to be a non-compliance and breach of employment laws covered by our employment practices and the policies set out in our Employee Handbook and/or supplier standards.

This is our sixth Policy Statement.

During the coming year we intend to add or amend this document as appropriate based upon our experiences.

The Company Directors shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources to ensure that modern slavery is not taking place within the company or supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and for the current financial year.

A handwritten signature in blue ink, appearing to read 'S. Matthews', followed by a horizontal line extending to the right.

Signed:
Steven Matthews
Divisional Managing Director