

## Modern Slavery Policy

### Introduction

This statement sets out Buxton Building Contractors Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps aimed at ensuring there is no slavery or human trafficking in our business and supply chains. This statement relates to actions and activities during the financial year 2021/2022.

As part of the construction industry, we recognise we have a responsibility to take a robust approach to slavery and human trafficking.

We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring our supply chains are free from slavery and human trafficking.

### Company Structure and Supply Chains

This statement covers the activities of Buxton Building Contractors Ltd:

- we are a main contractor construction company.
- our supply chain typically includes architects, design consultants, civil engineers, health and safety advisers, structural engineers, brick layers, labourers, electricians, plasterers, glazing/façade engineers, plumbers, carpenters and joiners, ground workers and any other specialist contractors/advisers appropriate for the project.

### Countries of operation and supply

We currently operate in the UK. Projects are generally throughout London and the Home Counties operating from our Head Office in Caterham, Surrey.

### Assessment process

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- undertaken a slavery and human trafficking risk assessment to enable us to apply a risk based and proportionate approach to dealing with slavery and human trafficking issues;
- reviewed the contracts we have with our supply chain and amended these to require compliance with the Modern Slavery Act 2015 where appropriate;
- for those of our supply chain with whom we have entered into a Buxton Building Ltd trading agreement, we have enhanced our audit process to include slavery and human trafficking issues;
- we will, where appropriate, ensure our supply chain be registered with the Construction line validation system, which requires our supply chain to confirm their compliance with the Modern Slavery Act;
- we communicate and encourage any individual to confidentially raise a potential issue;
- plan to implement targeted training for those involved in procurement and/or with responsibility for supply chain management.
- currently developing a process for targeted, high risk projects in circumstances where we are procuring directly.

## Relevant Policies

We operate the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy**  
We encourage all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact our HR team to make a confidential disclosure.
- **Employee Code of Conduct**  
Our employee handbook makes clear to employees the actions and behaviour expected of them when representing the company. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.
- **Supplier/Procurement Code of Conduct**  
We have developed a supplier/procurement code of conduct to ensure our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We will work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the company's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency Workers Policy**  
We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency it is using before accepting workers from that agency.

## Due Diligence

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The company's due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain;
- we are creating a process conducting supplier audits or assessments through which will have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

## Training

The company are developing training for staff on modern slavery. We will also roll this out to our supply chain via tool box talks. The training will cover:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the company;
- what external help is available, for example through the Modern Slavery Helpline;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the company's supply chains.

## Awareness Raising Programme

As well as training staff, the company has raised awareness of modern slavery issues by putting up posters across the company's premises detailing:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the company; and
- what external help is available, for example through the Modern Slavery Helpline
- Modern slavery posters in offices and on-site

## Managing Director Approval

This statement has been approved by the company's Managing Director.



David Norman  
**Managing Director**

Date: 06 April 2023

Next Revision Date: 05 April 2024