



binary geek limited

# BGL-PL-110

## Anti-Slavery Statement & Policy

### [Abstract](#)

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that BGL has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain

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## 1.0 Overview

<b>Last Update</b>	2 <sup>nd</sup> October 2020
<b>Effective Date</b>	2 <sup>nd</sup> October 2020
<b>Update Performed By</b>	Andrew Roberts, Director

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, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

## 2.0 Purpose

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that BGL has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

## 3.0 Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

## 4.0 Policy

Appropriate measures must be taken when using workstations to ensure the confidentiality, integrity and availability of sensitive information, and that access to sensitive information is restricted to authorized users.

### 4.1 Internal Policies

- 4.1.1 BGL operates a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:
  - 4.1.1.1 All workforce members are required to carry out training on modern slavery within the first 6 months of their contract
  - 4.1.1.2 All workforce members participate in a quarterly ethical and compliance questionnaire which includes the ability to flag and report concerns in relation to modern slavery both internally and with suppliers

4.1.1.3 We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will

## 4.2 Supplier Policy

4.2.1 BGL operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery.

4.2.2 In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

4.2.2.1 They have taken steps to eradicate modern slavery within their business

4.2.2.2 They hold their own suppliers to account over modern slavery

4.2.2.3 (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)

4.2.2.4 (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations

4.2.2.5 We may terminate the contract at any time should any instances of modern slavery come to light

## 5.0 Policy Compliance

### 5.1 Compliance Measurement & Performance Indicators

We know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified

## 6.0 Revision History

Version	Date of Change	Responsible	Summary of Change
1.0	26 <sup>th</sup> May 2017	Andrew Roberts	Initial Revision
2.0	2 <sup>nd</sup> October 2020	Andrew Roberts	Review and general compliance update