



INNOVATIVE. TRANSPARENT. COMPLIANT



# Modern Slavery Policy

Policy No. POL0200

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Written by **Lisa March**  
Head of Human Resources

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## MODERN SLAVERY 2021 POLICY

Bellrock Property & Facilities Management Limited and its subsidiaries (“the Bellrock Group” or “the Group”) have a zero-tolerance approach to any form of modern slavery, servitude, human trafficking and forced labour.

We are committed to acting ethically, with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## OUR POLICIES

A number of our ISO 9001 assured policies and processes ensure that we are conducting business in an ethical and transparent manner. These include:

**Recruitment.** The Bellrock Group operates 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.

**Whistleblowing.** The Bellrock Group whistleblowing policy and freely available employee assistance programme assures all employees that they can raise concerns about colleagues’ treatment, or practices within our business or supply chain, without fear of reprisal.

**Health and Safety.** These policies and standards explain the manner in which we behave as an organisation and how we expect our suppliers to act as evidenced through our policies.

## CODE OF ETHICS

The Bellrock Group aspires to have solid and durable relationships with those it does business with, suppliers, employees and local communities, government agencies and the public at large. It is our policy to always deal with all contacts honestly, responsibly and with integrity, whilst maintaining high standards, with the people and businesses in all of the areas we operate.

Bellrock’s reputation and the trust and confidence of those with whom we deal is one of our most vital resources. The protection of this resource is of fundamental importance and in recognition of this importance, it is right that our core values and approach to business are set out as clear sets of principles, rules and expectations.

The Code of Ethics and Business Conduct is available in our staff handbook which is issued to all employees upon commencement of employment and is also available via our intranet, ensuring that all employees comply with our requirements.

## OUR SUPPLY CHAIN

### Risk Assessment

Bellrock works with key supply chain partners, all of whom must complete and pass an annual assessment of their policies, carried out by independent third party. In addition, our suppliers, are required to provide evidence of a properly authorised Slavery and Human Trafficking Statement, signed and dated by an authorised officer; before they are added to our approved supplier list.

The Bellrock Group is committed to paying at least the national minimum wage in the United Kingdom and any prevailing minimum wage appropriate to employees resident in other countries.

## Our Due Diligence Processes

Our policies and are enforced in an effort to ensure that slavery and human trafficking is not taking place within our business or supply chain.

The thorough procedures undertaken with our supply chain partners acts as confirmation to Bellrock that they are committed to ensuring that slavery and human trafficking is not taking place within their own supply chain.

Our procurement team undertakes audits as part of our supply chain management to provide assurance that our suppliers are responsible partners in our service delivery. We select a number of Tier One suppliers for assessment and continue to analyse our supply chain for potential risk in the light of changes that will come from the transformation projects being undertaken with the business. Any identified shortfalls are remedied by putting a plan of action in place, to ensure that the issues are rectified.

## Training on Slavery and Human Trafficking

Activities are undertaken within our business and with our supply chain to raise awareness of Modern Slavery, as detailed previously, e.g. audits of tier one suppliers, annual supplier assessments.

## MEASURING OUR EFFECTIVENESS

Bellrock have an agreed set of defined measures to ensure that our processes are effective and to identify opportunities to improve further. These key measures are defined below:

1. Percentage of employees that have successfully completed their Modern Slavery training.
2. Number of modern slavery issues reported through our Whistleblowing helplines.
3. Percentage of Tier 1 suppliers that have been audited (including their Modern Slavery policies).
4. Percentage of Tier 1 suppliers that agree to our Supplier Code of Conduct.

**This statement is made in accordance with the requirements of section 54 (1) of the Modern Slavery Act 2015, approved by the Board of Directors of the Bellrock Group.**

A handwritten signature in blue ink, appearing to read "D Smith".

David Smith  
Chief Executive Officer  
February 2021