

# Modern Slavery Policy Statement

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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 2018 we did not encounter any issues on our own managed construction sites. We continue to be vigilant and have learnt more about the real concerns and problems with Tackling Modern Slavery by sending our HR Manager on a one- day seminar hosted by The Police and Crime Commissioner for Suffolk. The seminar highlighted the fact that modern slavery is happening all over the country including Suffolk and therefore we continue to raise awareness across our business.

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

## Company Structure and Business

The Barnes Group Limited consists primarily two trading divisions, Barnes Construction, acting as principle construction contractor and Bower Fuller dealing with mechanical and electrical projects with approximately 20 central service staff employed by The Barnes Group Ltd; we are a family-run organisation. The Head Office is based in Ipswich, Suffolk with an additional Bower Fuller Office in Dartford. Barnes Construction directly employs approximately 100 staff and Bower Fuller directly employs approximately 70 staff; both use several subcontractors and agency workers.

We have an annual turnover in excess of £36m or more and operate solely in the UK.

## Our Supply Chains

The Barnes Group Ltd 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 but the vast majority is sourced via our local supply and subcontractor chains.

## Relevant Policies

We will always aim to act with integrity across all of 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 Whistle-Blowing
- 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 ensure that 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, then we would immediately ring 999.



We operate under ISO 9001, ISO 14001 and OHSAS 18001.

### **Subcontractors Adherence to Our Commitment**

We have zero tolerance to slavery and human trafficking and we expect all of 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-contractors 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.

### **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 Group policies set out in our Employee Handbook and/or supplier standards.

Previously during a review of our processes, we have sent information entitled Modern Slavery: A Briefing for the Construction Industry to our Barnes Construction Site Managers and Contracts Managers. The information is very clear and highlights what to be alert for within the construction industry, it gives a helpline number and web site details. The information is laminated and displayed, on all our own managed sites, in the welfare areas, accessible to all on site.

This is our third Policy Statement and we continue to make our employees aware of the real issues surrounding modern slavery. We intend to hold a presentation, based upon the messages learnt on the Tackling Modern Slavery seminar, to the Barnes Construction Site Managers at a site manager's dinner and to the Bower Fuller senior management, as appropriate. To date we have not encountered any issues on our own managed sites or aware of any issues on sites where we have worked.

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.



Signed:  
**Mark Hart**  
Joint Divisional Managing Director  
Dated: March 2019



Signed:  
**Bob Steward**  
Joint Divisional Managing Director

