

## Modern Slavery Statement

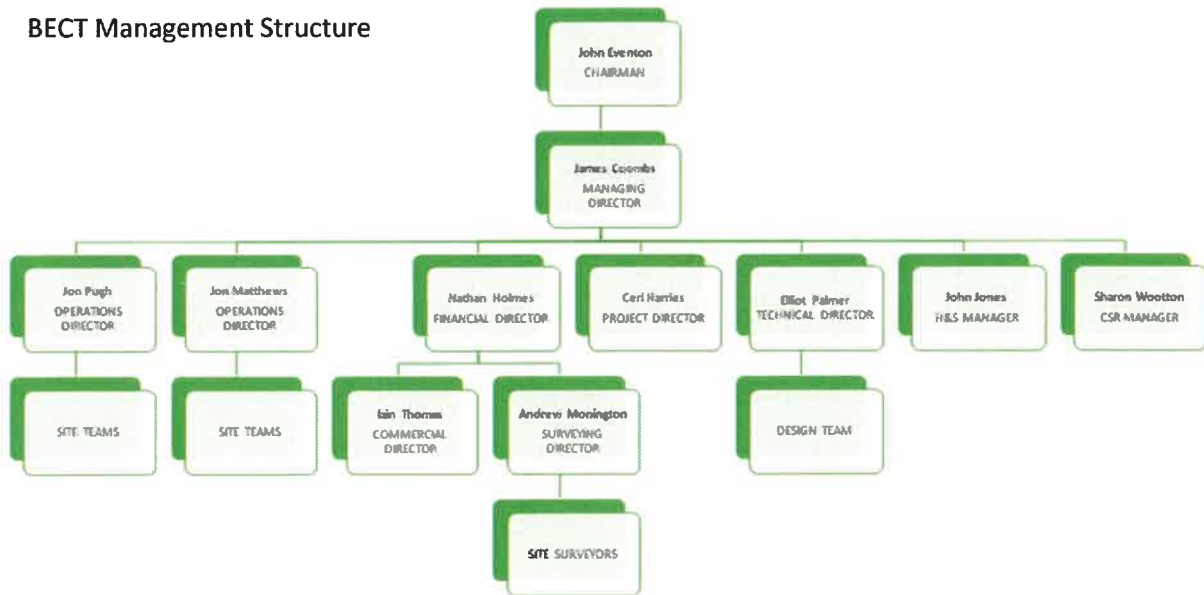
### A) ORGANISATIONAL STRUCTURE

BECT are based in Cardiff, other offices are located on working construction sites. We do not operate in any other country other than United Kingdom and all our employees have the right to work in the UK.

BECT are a Management Construction Company, working alongside design teams and employing Subcontractors to carry out works on our sites. Our Modern Slavery Policy is displayed on our notice boards, and we spot check to make sure all subcontractor employees are working of their own free will.

The labour supplied to BECT in pursuance of its operation(s) is carried out in various locations currently situated in Cardiff and surrounding areas in Wales and the South of England.

BECT Management Structure



### B) DEFINITIONS

We consider that modern slavery encompasses:

- Human trafficking.
- Forced work, through mental or physical threat.
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse.
- Being dehumanised, treated as a commodity, or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

### C) COMMITMENT

We acknowledge our responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. We understand that this requires an ongoing review of both our internal practices in relation to our labour force and, additionally, our supply chains.

BECT does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to BECT in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. We strictly adhere to the minimum standards required in relation to its responsibilities under relevant employment legislation in United Kingdom.

### D) SUPPLY CHAINS

To fulfil its activities, BECT's main supply chains include those related to Various works associated with new build and fit out projects. Many of our supply chain are partnered with, therefore we have close working relationships. We ensure (be means of policies, training, and meetings) that we ALL observe the Modern Slavery Act 2015

In general, we consider our exposure to slavery/human trafficking to be *relatively limited*. *Nonetheless*, we have taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

### E) IMPACT OF COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for BECT, as it did for others across the nation.

We welcome the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

We would conclude that the COVID-19 pandemic *did not* adjust the risk of modern slavery to a level above that which existed before the pandemic.

During the pandemic, the Group's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, Group employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking

Our modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.



**F) STEPS**

We carry out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in our business or supply chains, including conducting a review of the controls of its suppliers.

BECT has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, we have taken the following steps to ensure that modern slavery is not taking place:

- Working with subcontractors that are known to us and observing their modern slavery statements
- Training our staff to know the signs of potential modern slavery
- Regular meetings and induction training on Modern Slavery issues and how to spot the signs

**G) KEY PERFORMANCE INDICATORS**

BECT has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in BECT or our supply chains.

- We individually check NI Numbers
- We ask each worker for an identification card
- We ensure foreign worker on our sites are there of their own free will (Induction) 1 to 1

**H) TRAINING**

BECT provides the following training to staff to effectively implement its stance on modern slavery induction training, Videos of how to spot possible modern slavery cases; Modern Slavery Polices disseminated throughout our business.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval.....1/9/21.....

Signed..........