

# Modern Slavery Statement

Sept 2023

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## Introduction

It is the BGEN policy to conduct business in an ethical manor that ensures no acts or practises will be in breach of the Modern Slavery Act 2015.

BGEN are committed to ensuring that we adhere to the highest ethical and legal standards. This is reflected in all that we do.

The BGEN Board attaches the upmost importance to this policy and will take a “zero tolerance” approach to any acts of modern slavery or human trafficking conducted either by our employees or any other business partners or customers.

## Organisation Structure and Business

BGEN Ltd offers a broad range of sector-specific expertise within power & energy, pharmaceuticals, water and utilities, and food and beverage, combined with the multi-disciplinary, in-house approach to provide delivery with full transparency and accountability. We deliver projects across the UK, Europe, Africa, and the Far East.

BGEN has been active in the United Kingdom for over 100 years and employs nearly 1000 staff, located in various locations including offices, production facilities, and fabrication shops.

## Our Supply Chain

BGEN are 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.

## Our Policy on Slavery and Human Trafficking

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 have various internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

## Supplier Code of Conduct

BGEN are committed to an open and honest relationship with our suppliers. This Supplier Code of Conduct refers to company expectations regarding suppliers' behaviour when conducting business with BGEN. It is designed to build trust and maximise confidence with our suppliers to deliver the best possible service and outcomes. It applies to all suppliers, contractors, subcontractors, service providers, consultants and agents.

## Whistleblowing Policy

BGEN policy is to encourage employees and others who have serious concerns about any aspect of BGEN to come forward and voice those concerns. Employees are often the first to realise that there may be something seriously wrong within BGEN. 'Whistleblowing' is viewed by BGEN as a positive act that can make a valuable contribution to BGEN's efficiency and long-term success

## Recruitment Policy

The company 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.

## Statement of Ethics

BGEN's Statement of Ethics is a commitment to adhere to agreed ethics and acceptable standards in preventing illegal working.

## Prevention of Illegal Working

BGEN's Prevention of Illegal Working Policy refers to the duty the company has to ensure that anyone we employ is not disqualified from working in the UK, or carrying out the work in question, by reason of their immigration status.



## Due diligence into Slavery and Human Trafficking

As part of BGEN's due diligence into slavery and human trafficking, the Supplier Approval process incorporates a review of controls undertaken by the Supplier. BGEN ensures that all new suppliers or sub-contractors complete a supplier and sub-contractor pre-qualification questionnaire which includes a declaration that they do not engage in or utilise the services of suppliers and sub-contractors who have links to modern slavery, human trafficking or child labour.

BGEN conducts due diligence regarding new employees, ensuring that when setting up payroll the new employee bank account holders name matches the employee's details. All recruitment is carried out in a fair and transparent way and will comply with relevant legislation and standards.

## Risk Assessment

Having an effective risk assessment process lies at the very heart of the success of this policy. The use of the risk assessment process will help BGEN pinpoint specific areas in which risks of modern slavery could occur. The risk assessment outputs will be subject to review by the BGEN Board.

## Monitoring and Control

BGEN will ensure that an effective system of control and monitoring takes place across various transactions. The Compliance Officer will ensure management engage in effective risk management and will implement the necessary steps to prevent modern slavery within the BGEN business or its supply chain.

## Key Performance Indicators

BGEN is committed for the financial year 2023/2024 to the following actions:

- Increased Governance – Introduction of supplier PQQ process, inc. MS criteria
- Increased Strategic Focus – Introduction of BGEN ESG Policy, inc. MS Goals
- Agency Audit – Sample Audit of BGEN Approved Labour Agency partners
- Supplier Audit (Cont'd) – Sample Audit of BGEN's component suppliers
- Training - achieve >75% attendance at annual modern slavery e-training

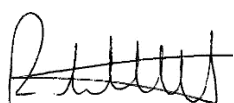


## Training on Modern Slavery and Human Trafficking

BGEN has developed an eLearning module on Modern Slavery and Human Trafficking. This training is mandatory for all employees (white collar) and completion forms part of an employee's annual performance targets and is therefore subject to formal monitoring. To supplement this training, the Modern Slavery topic will be communicated in an all-employee email cascade and toolbox talks delivered to our blue-collar employees. In addition, BGEN is rolling out further training specific to those employees involved in purchasing responsibility.

## Our Commitment

BGEN Ltd will not tolerate any violations of applicable law – and if it does happen, we will take strong action. We will continue to apply a zero-tolerance approach to forced labour, slavery, and human trafficking in any form, in our business and supply chain.



**Robin Whitehead**  
**Chief Executive Officer**  
**On Behalf the Board of Directors For and on behalf of BGEN**

**September 2023**

