

Slavery and Human Trafficking Policy

Status of this policy

This policy does not give contractual rights to individual employees. The Company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.

Objectives of this policy

This statement is made in compliance with the Modern Slavery Act 2015 and aims to set out the steps taken by Beard to prevent slavery and human trafficking from taking place in any of its supply chains or in any part of its business, and the ways it has sought to minimise the risks of any association with practices which undermine the principles of safety and dignity for its customers, employees and business partners.

About Beard/ Organisation Structure

Beard is an award-winning construction company which has been providing our customers with innovative solutions to complex projects for more than 125 years.

We deliver quality design-and-build, new-build, restoration and refurbishment work on a range of projects, including complex projects, up to £30 million, as well as providing turnkey maintenance services for smaller schemes.

With offices in Oxford, Swindon, Guildford, Bristol and Southampton we offer practical, cost-efficient and sustainable construction services across the arts and culture, commerce and industry, education, healthcare, emergency services, elderly care, sports and leisure and defence sectors.

Philosophies and Principles

Beard is proud of the ethical approach and standards that it has developed over many years and believes that these standards are consistent with the underlying principles of the Modern Slavery Act 2015. Our culture is built on trust and openness and the aiding, abetting, counselling or procurement of forced labour and human trafficking would not be tolerated under any circumstances.

Beard adopts and operates a culture with extensive communication and interaction between all parts of the company. We believe this approach helps us to establish and nurture a culture of trust that fosters and embraces openness whereby all individuals feel safe to discuss their opinions, views and/or concerns without fear of reprisal, subsequent discrimination or disadvantage. We treat all employees, contractors, stakeholders, suppliers, clients and any members of public with whom we come in to contact, with respect.

We are aware of the many reason that the construction sector can become targets for modern slavery and labour abuse, and we are committed to preventing these practices from occurring within both our business and our supply chain.

Relevant Policies

Beard realises that slavery and human trafficking can occur in many forms such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse, but due to the specific nature of our business, we believe that there is a low risk of these sorts of practices occurring in our business and supply chain. This risk is further mitigated by Beard's culture and policies as outlined below. There are clear, organisational policies, procedures and processes in place within Beard which demonstrate and support our commitment to combating modern slavery, which include as follows:

Business Conduct and Bribery – Adoption and acceptance of this policy is mandatory for all Beard staff, and the policy states that Beard will not engage in business with any contractors/subcontractors, sub-consultants, suppliers or agents who are not able to demonstrate a similar commitment to that of Beard in operating in a fair, honest and equitable manner.

Employee Code of Conduct - Beard's code makes clear to employees the standards of conduct and behaviour expected of them when representing Beard. We strive to maintain the highest standards of employee and supply chain conduct and ethical behaviour when undertaking projects, and in particular in different jurisdictions or cultures, and are considering how this code may be updated to include more specific modern slavery initiatives in relation to the identification and management of risk by our employees.

Whistleblowing - Beard operates a whistleblowing policy which encourages all its workers, customers and other business partners to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that may give rise to unethical practices or behaviours, including enhanced risk of slavery or human trafficking. Beard's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation, and so we hope this will contribute to identifying any potential risk of modern slavery and/or human trafficking occurring within our business or supply chain.

Recruitment Guidelines - Beard either recruits individuals directly or uses a list of pre-approved agencies with whom it has a written contract, and who share Beard's professional and ethical approach to recruitment. Beard seeks to verify the practices of each of these agencies before a contract is agreed and the agency is engaged on any recruitment assignment, whether it is of a permanent or temporary nature. This includes seeking contractual assurances that the agency ensures its candidates are paid at least the applicable national minimum wage in the country in which they are engaged.

Supplier Approval Procedures – all new suppliers are required to complete questionnaires before being included within Beard's supply chain. This process focusses on health and safety compliance, but also includes more ethical considerations, including in relation to combating modern slavery. Please see the section on due diligence and managing risk below.

National Living and Minimum Wage – Our employees are paid above the Living Wage (which is above the government determined minimum wage) which shows a commitment to avoiding labour exploitation within our own business.

All policies and procedures of Beard are regularly assessed and periodically updated against best practice.

Due Diligence/Managing Risk

Beard does not wish to be associated with any organisation that either has or is found to be involved with either human trafficking or modern slavery. If we were to find evidence that one of our suppliers has failed to comply with the Modern Slavery Act 2015 then we would require the relevant supplier to remedy such non-compliance and we would consider terminating our relationship should we see no substantial improvement in the way their business is conducted.

We carry out specific due diligence on our suppliers from a modern slavery perspective. As part of Beard's efforts to monitor and reduce the risk of modern slavery and human trafficking occurring within its supply chains, our supplier questionnaire incorporates a requirement for all suppliers to comply with Beard's Business Conduct and Bribery Policy, National Minimum Wage Regulations and the Modern Slavery Act 2015. Where appropriate, copies of the policies will be sought from the suppliers so that we can review their own procedures for complying with Beard's requirements and we may seek contractual assurances in this regard.

By extending these commitments beyond our own employees we are helping to improve standards and working conditions throughout our supply chain, and Beard will provide adequate resources, training and investment to ensure its successful application on an ongoing basis.

Training and Key Performance Indicators

Given our view that Beard's exposure to modern slavery risk is limited, and the existing due diligence and other processes we already have in place as an organisation, we have not implemented any specific training or key performance indicators in relation to modern slavery and human trafficking. However, in circumstances where we consider there may be risks, appropriate training will be developed and targeted at those personnel who may have direct exposure. This approach will be reviewed periodically by the directors and senior management.

Board Approval

This statement has been approved by the board of directors who will review and update it as necessary on an annual basis.

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015



Mark Beard
Chairman

12 January 2026