

## **Slavery and Human Trafficking Statement**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending 31.12. 2024

Beard is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

### **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 120 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. We have an annual turnover in excess of £150 million. We employ around 315 people, all working and based on the UK

On that basis we do not consider that we operate in an industry or sector which is particularly at risk to labour exploitation or other forms of slavery and human trafficking, but we are nevertheless committed to preventing these practices from occurring within both our business and our supply chain.

### **Supply Chain**

Our key supply chains involve delivering a full range of construction services, harnessing skills and commitment to meet the needs of modern construction processes. Our supply chain key geographic regions are UK wide.

### **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 will 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.

### **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.

**Safeguarding Policy** - We will take responsibility for the safeguarding of children, and vulnerable young people and adults whom we come into contact with as part of our day-to-day office and site operations.

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

We facilitate training to key staff to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and effectively operate our policies and procedures aimed at mitigating this risk.

### Previous 12-month actions review

We set out steps to monitor the effectiveness of our actions against modern slavery and human trafficking. Below sets out our targets and actions taken over the previous 12 months.

- Kept under review our Anti-slavery and Human Trafficking policy.
- Kept under review the due diligence procedures for our supply chain processes.
- Continued to train and raise awareness of our staff to enable them to identify potential modern slavery or human trafficking.
- Introduced more frequent supply chain workshops to support suppliers / sub-contractors.
- Enhanced the training of our mental health first aiders to help them identify the signs of modern slavery and human tracking.

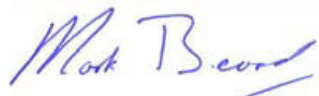
### Future Action

We aim to take the following further steps over the course of the next financial year.

- Create a supply chain code of conduct.
- Explore with 3<sup>rd</sup> party organisations ways of enhancing our audit process.
- Work with the GLAA, Gangmasters and Labour Abuse Authority, to enhance our inductions and poster campaigns.
- Continue to monitor and review progress at regional senior management meetings.
- Review PSA, preferred supplier list, for labour and trades.
- Explore ways to develop / create online training platform to offer enhanced training.
- Include within business improvement commercial hub objectives – engagement with supply chain.

### Board Approval

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



Mark Beard  
Executive Chairman

10 January 2024

(review December 2024)