

MODERN SLAVERY POLICY

1. Purpose

The purpose of this policy is to confirm BMM Weston's commitment to preventing modern slavery and human trafficking in all its forms within our business operations and supply chains. We recognize our responsibility to act ethically and with integrity in all our business dealings.

2. Scope

This policy applies to all employees, contractors, suppliers, and business partners of BMM Weston.

3. Definitions

- **Modern Slavery** can be defined as the recruitment, movement, harbouring or receiving of individuals through the use of force, coercion, abuse of vulnerability, deception or other means for the purposes of exploitation.
- **Human Trafficking** can be defined as the unlawful act of transporting or coercing individuals to benefit from their work in service

4. Commitment

BMM Weston is committed to ensuring transparency in our own business and to tackling modern slavery through every aspect of our supply chains. BMM Weston also retains a firm commitment to work within the boundaries of the Modern Slavery Act 2015, and all other applicable anti-slavery and human trafficking laws and regulations. Furthermore, BMM Weston will continuously review and improve our practices to combat modern slavery, and will be ready to take immediate action when required.

5. Adherence to Local and National Laws

We are dedicated to comply with all local and national laws related to modern slavery and human trafficking in every jurisdiction where we operate. In the event of changes to local or national laws concerning modern slavery and human trafficking, BMM Weston commits to an immediate review of the Modern Slavery Policy, and to act in accordance with local and national law. BMM Weston will be open to all collaboration with local authorities and organizations to ensure our practices align with legal requirements.

6. Key Principles

6.1 Freedom of Workers to Terminate Employment

- Workers are free to terminate their employment at any time without penalty, provided they give reasonable notice as per their contract.

6.2 Freedom of Movement

- The movement of BMM Weston staff will not face restrictions, and they will not be barred from leaving the premises or their place of work.

6.3 Freedom of Association

- Workers have the right to form and join trade unions and other associations of their own choosing, and to bargain collectively.

6.4 Prohibition of Threats, Violence, Harassment, and Intimidation

- Any form of threat, violence, harassment, or intimidation against staff is strictly prohibited.

6.5 Prohibition of Worker-Paid Recruitment Fees

- BMM Weston will never demand or accept any recruitment fees from its staff, under any circumstance.

6.6 Prohibition of Compulsory Overtime

- All overtime must be voluntary and compensated in accordance with the Working Time Regulations 1998, and other relevant legislation.

6.7 Prohibition of Child Labour

- BMM Weston adheres to the minimum age requirements as stipulated by local and national laws and international standards.

6.8 Prohibition of Discrimination

- BMM Weston commits to principles of the Equality Act 2010, and will take all appropriate measures to tackle and prevent discrimination based on the protected characteristics. These characteristics include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

6.9 Prohibition of Confiscation of Workers' Original Identification Documents

- Under no circumstance will BMM Weston confiscate or withhold workers' original identification documents, such as passports.

6.10 Access to Remedy, Compensation, and Justice for Victims of Modern Slavery

- We provide access to remedy, compensation, and justice for victims of modern slavery, ensuring their rights are respected and restored.

7. Responsibility

The Board of Directors will assume overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Managers are held responsible for implementing this policy in their respective areas and ensuring compliance. Furthermore, employees are expected to comply with this policy and all parties have a responsibility to report any suspected modern slavery in any part of our business or supply chains.

8. Due Diligence

BMM Weston will undertake due diligence when considering new suppliers and regularly review our existing suppliers. We commit to evaluating the modern slavery and human trafficking risks of each new supplier, and to conduct supplier audits where necessary. We will implement systems and controls to monitor potential risk areas in our supply chains, and we encourage other suppliers to implement similar measures.

9. Training

BMM Weston will provide training to ensure that all relevant employees understand the risks of modern slavery and human trafficking in our business and supply chains. These employees will receive training and support to identify signs of modern slavery and report concerns.

10. Reporting Concerns

Employees are expected to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest opportunity. We provide a confidential whistleblowing mechanism for reporting concerns.

11. Monitoring and Review

This policy will be reviewed annually by the Board of Directors to ensure its effectiveness. A policy review will also be conducted if there are changes to the relevant legislation, so any necessary improvements will be made as soon as possible. We will monitor our performance against this policy.

12. Approval

This policy has been approved by the Board of Directors and signed by a Director of the Company.

Signed



Date 15th February 2024