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## Modern Slavery Statement

### 1. The statement

This statement is made in accordance with s.54 of the Modern Slavery Act 2015 and sets out the steps that Brownlee Cale has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery includes slavery, servitude, human trafficking and forced labour. Brownlee Cale has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### 2. Our business

Brownlee Cale specialises in the recruitment of trades, technical, operational and managerial staff on both a permanent and temporary basis within the construction, civil, engineering, mining and consultancy. We are ISO 9001 accredited, our quality management and competence systems provide the framework to manage and direct Brownlee Cale operations

### 3. Our high risk areas

Brownlee Cale recognise that Trades and Labour supply represents a potential area of risk, more so than other service areas of the business. Our primary risk mitigation strategy is the compulsory application of stringent right to work checks for all of our candidates and a commitment to ensure that our suppliers operate in the same way, working within the policies outlined below. Audit checks are embedded within our recruitment and supplier due diligence processes and are an annually audited function of our ISO accreditation.

### 4. Our policies and procedures

We operate a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-slavery policy. This policy set out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- Recruitment Procedure. We operate a robust recruitment policy, whereupon initial candidate engagement ensures compulsory eligibility checks to work in the UK are conducted for all

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employees to safeguard against human trafficking or individuals being forced to work against their will.

- Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

## **5. Our suppliers and services**

Brownlee Cale operates a supplier policy and maintains a Preferred Supplier List. We conduct due diligence on all suppliers & customers (pre-care) before transactions take place. This includes an online search to ensure that the organisation hasn't been convicted of offenses relating to modern slavery.

We conduct comprehensive aftercare checks to follow up and ensure our candidates and clients have appropriate welfare facilities, had an induction, RAMS, access to our clients modern slavery and whistle blowing policy. Our anti-slavery policy forms part of values of caring and standards. Pre-care and aftercare processes are integral to Brownlee Cale operations. We operate a 3-pronged approach where Brownlee Cale check, follow up and review our clients, candidates and supplier's status and compliance to regulatory and legislative requirements

## **6. Training**

We regularly conduct training for our sales, support and finance teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. All employees are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. Our colleagues have constant access to all of our policies, as well as access to further training and learning materials in regard to modern slavery and human trafficking.

## **7. Our performance indicator**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or customers if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Signed