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**Introduction**

This Policy Statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes as BCM Construction Slavery and Human Trafficking Policy/Statement.

**Organisation Structure and Business**

BCM Construction is a customer focused building, civil engineering and environmental services company working on the UK rail infrastructure.

For over 25 years, BCM Construction has been providing a wide range of project delivery services to the rail industry and working with our customers to deliver a first-class service on time and on budget without comprising quality, safety or the environment.

We work with customers to innovate and adapt to their changing needs, in a way that delivers best value solutions.

We continue to broaden our range of activities in response to customer demand. This enables BCM Construction to deliver continuous improvement and provides opportunities for planned growth through new services in our chosen market sectors.

BCM is managed by the Board of Directors, has 90 employees located across 5 main offices.

We believe in delivering an excellent level of service with an aim to winning repeat business. We have re-engineered our entire IMS to strive for excellence in our business operations. We plan to grow and expand our business and have a comprehensive strategic plan on how to deliver our strategic goals. We value our people and are using the 'Investors in People' framework. We also introduced Core Values: We Stay on the Safe Side, We Care About People, We Take Pride in Our Work. We understand the importance of training our people and have numerous training programmes in place. Where we cannot find suitable training on the market we have developed our own training programme's, such as "Watch my Back" and our ETE competency training.

**Policy Statement - Our Ethos on Slavery and Human Trafficking**

BCM Construction is committed to combatting Slavery and Human Trafficking and takes responsibility for ensuring that its working practices comply with the Modern Slavery Act 2015. This Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure Slavery and Human Trafficking is not taking place anywhere within our Company or supply chain.

**Due Diligence**

After conducting an audit of our business and supply chain to assess areas of risk and likely exposure, the likelihood and severity of risk within the construction business has been found to be negligible. As part of the Company's due diligence process, we continually monitor and adopt effective systems to ensure that BCM Construction does not support or deal with any business or individual knowingly involved in Slavery and Human Trafficking.

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### Supply Chains

We operate a zero tolerance policy to Slavery and Human Trafficking. Our Board Directors and Heads of Department responsible for procuring external goods and services, are dedicated to ensuring that suppliers and providers always adhere to our ethos and support our compliance to the Modern Slavery Act 2015.

All staff involved in the procurement of goods and services, including our Procurement and Compliance team deal with known and trusted supply chains and to discuss the potential risks relating to any new supply chains. All new supply chains have been provided with a copy of this Policy and are required to confirm their compliance with our ethos before commencing the supply of goods or services.

### Recruitment

Our HR policies and recruitment practices ensure compliance with The Modern Slavery Act 2015 and all other relevant employment legislation. Auditing practices are in place for checking that all employees have the right to work in the UK. We are continually reviewing our recruitment methods throughout the business to ensure transparency. Training for those employees who are engaged in recruitment and in sourcing and managing a supply chain, ensures that Slavery and Human Trafficking are not taking place within the organisation or its' supply chain.

### Training

Any member of staff involved or likely to be involved in the procurement of goods and services has been specifically trained in the requirements of The Modern Slavery Act 2015. The Modern Slavery Act 2015 it is unlikely to be relevant to the majority of our staff as they are not involved in the procurement of goods or services. Regardless, this policy has been distributed to all members of staff and is permanently available to access on our internal database, Omni.

### Reporting

If an employee has any concerns regarding a likely risk of, or actual breach of our Policy or the Legislation, this must be raised through See It Sort It Report It system or with Head of Compliance, or HR Manager.

Reporting can also occur in accordance with the Grievance Policy in general or with the Whistleblowing section of the Grievance Policy in particular.

All staff involved in the procurement of goods and services must contact HR Manager if they have any concerns about Slavery or Human Trafficking or if they are aware of or suspect a breach of The Modern Slavery Act 2015.

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