

## Modern Slavery Policy Statement 2023

In accordance and compliance with Section 54(1) of the Modern Slavery Act 2015, Brown & Carroll (London) Ltd is committed to conducting all aspects of its business in an ethical and transparent manner.

This statement sets out the actions we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2023.

### **Our business and supply chains**

We specialise in the design, manufacture, and installation of high-quality joinery and fit-out products for office, commercial, and residential properties. Our projects are primarily in London, but increasingly throughout the rest of the UK. We have also provided solutions for clients in Europe, and U.S.

A multi-disciplined supply chain supports us with our project delivery and factory production activities. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We are opposed to any form of slavery, including human trafficking, forced labour, debt bondage, the sale or exploitation of children and all exploitative practices in the workplace. We are not aware of any allegations of human trafficking/slavery activities against our suppliers, but if we were, then our values require that we would act immediately against the supplier and report it to the authorities.

### **Our policies**

We require all workers (and contractors) to be treated with dignity and respect. We are:

- ✚ Opposed to child labour
- ✚ Committed to safe working conditions within local laws
- ✚ Committed to upholding the following employment conditions:
  - workers right to choose,
  - free from discrimination,
  - working in accordance with our grievance procedures,
  - within wider employment contract, and
  - working hours and wages are in accordance with local laws.
- ✚ Opposed to slavery, human trafficking, forced labour, debt bondage, the sale or exploitation of children and all exploitative practices in the workplace.

These are embedded in our policies and procedures, including;

- ✚ Modern Slavery Policy
- ✚ Right to Work in the UK Policy
- ✚ Anti Bribery and Corruption Policy
- ✚ Recruitment and Selection Policy
- ✚ Equal Opportunities, Diversity and Social Policy
- ✚ Supplier Code of Conduct

We continue to enhance our position to prevent modern slavery, including:

- ✚ More stringent vetting of our supply chain, including agreement with our supplier code of conduct.
- ✚ Auditing our practices for checking all employees' terms and conditions.
- ✚ Going beyond the legal minimum wage requirement, we are now an accredited 'living wage employer'.
- ✚ Encourage the reporting of concerns and protection of whistle blowers, encouraging employees to report wrongdoing (including exploitation) in any form.
- ✚ Not knowingly supporting or dealing with any business (including suppliers) involved in slavery or human trafficking.
- ✚ A zero-tolerance commitment from our supply chain and contractors to comply with such values.

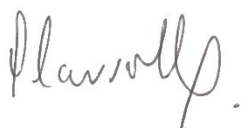
### **Supplier due-diligence**

We continue to raise modern slavery awareness within our business, with training, and through our supply chain, with supplier due-diligence. We continue to communicate details of responsibility, compliance, reporting, awareness and risk associated with modern slavery in relation to sub-contracted workers, procurement and supply chains. We recognise that the use of sub-contracted and specific types of workers (e.g. cleaners) increases the risk of modern slavery. In addition, we are aware that raw materials are sourced from many different countries, including some which are recognised as being high-risk areas for modern slavery.

### **Awareness**

Further to this statement and supporting policies, modern slavery remains an agenda item at HR management and annual strategic meetings. Supplier compliance documents, such as Pre-Qualification Questionnaires and a Supplier Code of Conduct are routinely issued.

This statement has been approved by the Brown & Carroll (London) Ltd board of directors and covers the company's financial year 2023.



Paul Carroll, Managing Director  
August 2023.