

Modern Slavery and Human Trafficking Statement

Introduction

Burghley Group Limited is fully committed to ensuring that slavery and human trafficking (within the meaning of the Modern Slavery Act 2015) are not taking place in any part of our own business or in our suppliers and sub-contractors. This policy statement sets out the approach that Burghley Group has taken.

Definitions

Burghley Group considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property; and
- being physically constrained or to have restriction placed on freedom of movement.

Our Commitment

We acknowledge our responsibilities in relation to tackling modern slavery and commit to complying with the provisions in the Modern Slavery Act 2015. We are committed to ensuring, so far as we are able, that there is no modern slavery or human trafficking in our supply chains, or in any part of our business.

We do not enter into business with any other organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

How we assess and manage risk

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

We take the view that modern slavery and human trafficking can occur anywhere in our operations, whether through our directly employed individuals, sub-contracted employees, agency workers, consultants or in the supply of materials.

The steps we have taken so far to identify and mitigate risk in respect of modern slavery and human trafficking are:-

- We check that all employees have the right to work in the UK upon commencement of their employment;
- We require our sub-contractors, suppliers and the labour agencies on our Supply Chain Lists have procedures in place to ensure their employees have the right to work in the UK;
- We aim to only engage agency workers from suppliers on our Supply Chain List;
- We procure the majority of our directly sourced materials from UK based companies that are required to comply with UK laws on forced labour;

- We check that anyone on our Supply Chain List who is legally required to have a Modern Slavery and Human Trafficking Statement does so;
- We have reviewed the contracts we have with our supply chain and amended these to require compliance with the Modern Slavery Act

Our Policies

In addition to our Modern Slavery and Human Trafficking Statement and our position of zero tolerance of any form of modern slavery, we have an Equal Opportunities Policy in place which sets out the conduct and behaviour we expect from all our employees in their treatment of others.

We will also be introducing a Whistleblowing Procedure so that any employee or third party can confidentially raise any concerns.

Next Steps

Being a relatively new business, we are early on in our journey towards putting the right processes and procedures in place to mitigate the risks in respect of modern slavery and human trafficking.

We have recognised the need to do more with regards to training to ensure that all our employees have a deeper understanding and are able to identify any potential unlawful or unethical conduct with our operations and supply chain;

We will continue to monitor the effectiveness of our actions so far against modern slavery and human trafficking and continue to review our pre-qualification process for the appointment of new organisations to our Supply Chain Lists. We will also continue to assess the potential risks with our existing supply chain.

As our approach to modern slavery and human trafficking develops, we will also look at devising a process of measuring our performance, e.g. having key performance indicators in place, so that we can assess how we are doing and what more we could do.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and constitutes Burghley Group's modern slavery and human trafficking statement.

Date of approval: March 2021

Signed by:

A handwritten signature in black ink that reads "Daniel Spencer". The signature is written in a cursive style and is positioned above a long, thin horizontal line that extends across the width of the signature.

Daniel Spencer
CEO