



Bader Malan Limited
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Email: Info@badermalan.co.uk
Company Registration Number 4329913

1. Introduction

Bader Malan Ltd is committed to preventing modern slavery and human trafficking in all its operations and supply chains. We uphold the principles of human rights and ethical business practices, ensuring that slavery, servitude, forced or compulsory labour, and human trafficking are not taking place in any part of our business or supply chains.

2. Scope

This policy applies to all individuals working for Bader Malan Ltd or on our behalf, including employees, contractors, suppliers, and any other third parties. It extends to all business operations, including those conducted by subsidiaries and affiliates.

3. Company Commitment

Bader Malan Ltd is committed to:

- **Zero Tolerance:** We have a zero-tolerance approach to modern slavery and human trafficking in our business and supply chains.
- **Compliance:** Ensuring compliance with the Modern Slavery Act 2015 and other relevant legislation and regulations.
- **Due Diligence:** Conducting appropriate due diligence on our supply chains and business partners to identify and mitigate risks related to modern slavery.
- **Training:** Providing training and guidance to our employees on identifying and preventing modern slavery in our business and supply chains.
- **Transparency:** Being transparent in our approach to tackling modern slavery, including publishing an annual Modern Slavery Statement as required by law.

4. Responsibilities

- **Board of Directors:** The Board has overall responsibility for ensuring that this policy complies with our legal and ethical obligations.
- **Management:** Management is responsible for implementing this policy, ensuring it is understood and followed by all employees, and taking appropriate action in the event of any suspected violations.
- **Employees:** All employees are expected to comply with this policy and report any concerns about modern slavery or human trafficking in any part of our business or supply chains.

Bader Malan Limited Modern Slavery Policy

5. Risk Assessment and Due Diligence

To prevent modern slavery, Bader Malan Ltd undertakes the following actions:

- **Risk Assessments:** We regularly assess the risks of modern slavery in our business and supply chains, particularly in high-risk areas such as overseas suppliers and industries known for higher incidences of modern slavery.
- **Supplier Due Diligence:** We conduct due diligence on new suppliers and business partners, including:
 - Requiring them to confirm their compliance with our ethical standards and policies.
 - Requesting information on their own policies and practices related to modern slavery.
 - Monitoring ongoing compliance through audits, site visits, and regular reviews.
- **Contractual Obligations:** We include modern slavery compliance clauses in our contracts with suppliers and business partners, requiring them to adhere to our standards.

6. Reporting and Whistleblowing

Employees and third parties are encouraged to report any concerns about modern slavery or human trafficking without fear of retaliation. Reports can be made through the following channels:

- **Line Manager:** Concerns can be raised with your immediate line manager.
- **Whistleblower Officer:** Concerns can be reported directly to the designated **Whistleblower Officer** : Louise Nelligan louise@badermalan.co.uk
- **Anonymous Reporting:** An anonymous report can be made via 01372 439355

All reports will be taken seriously and investigated promptly, with appropriate action taken where necessary.

7. Training and Awareness

Bader Malan Ltd is committed to raising awareness and providing training on modern slavery to all employees. This includes:

- **Induction Training:** New employees will receive training on this policy as part of their induction process.
- **Ongoing Training:** Regular training sessions for all employees, particularly those in roles with higher risks of encountering modern slavery (e.g., procurement, HR, site management).
- **Supplier Training:** Providing guidance and resources to our suppliers to help them understand and meet our expectations regarding modern slavery prevention.

8. Monitoring and Review

This policy will be reviewed annually to ensure it remains relevant and effective in preventing modern slavery in our business and supply chains. The Board of Directors will oversee the review process, considering changes in legislation, industry standards, and best practices.

9. Violations and Consequences

Any employee or third party found to be in breach of this policy will face disciplinary action, which may include termination of employment or contract. We may also terminate our relationship with any supplier or partner found to be engaging in modern slavery or human trafficking.

10. Communication

Bader Malan Limited Modern Slavery Policy

This policy will be communicated to all employees, contractors, suppliers, and business partners. It will also be available to the public via our company website.

Approval and Implementation

This policy is approved by the Board of Directors and is effective as of 28th August 2024

Louise Nelligan

Director