

## Modern Slavery and Human Trafficking Policy

### Introduction

Modern slavery is a crime and violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking (“modern slavery”), all of which include the deprivation of a person’s liberty by another in order to exploit the for personal or commercial gain.

Bridges recognises that it has a responsibility to take a robust approach to slavery and human trafficking, and the business is therefore compliant with the Modern Slavery Act 2015 and takes a zero-tolerance approach to modern slavery within its business and supply chains.

Bridges is committed to:

- (a) acting ethically and with integrity in all our business dealings and relationships;
- (b) implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains; and
- (c) ensuring there is transparency in our approach to tackling modern slavery in our business and in our supply chains consistent with our obligations under the Modern Slavery Act 2015.

### Procedure

Bridges ensures compliance of sections 15 to 25 of the Immigration, Asylum and Nationality Act 2006 (known as the 2006 Act) by obtaining a copy of documentation recognised by the Home Office to verify individuals Right to Work (RtW).

A list of compliant documents can be found here [Right to work checks: an employer's guide - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/442221/Right_to_work_checks_-_an_employer_s_guide.pdf)

All documents will be checked to ensure details offered are correct and verifiable, and that there are no risk of slavery or human trafficking. All documents are retained for at least 2 years after the individual has left the company.

Where individuals have a time limited permission to work in the UK, a follow up check takes place. HR has a system in place to notify them of any follow up required. This will ensure that any follow up’s are undertaken in a timely manner to prevent individuals overstaying their immigration where time is limited.

Furthermore, the organisation's policies makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

In addition, all subcontractors, agency and self-employed personnel undertake a formal process of engagement and onboarding which includes evidence of documentation to verify compliance. All information provided is then checked and verified by our HR and Payroll teams and the subcontractor must agree to our subcontractor code of conduct.

This policy has been approved & authorised by:

Name: Rachael Kendall      Position: HR Manager      Date: 19 June 24      Review date : 19 June 2025

Signature:

