



## **BAYFORD & CO LTD. MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **Introduction**

Bayford & Co Ltd. is committed to preventing slavery and human trafficking in all business activities, this statement outlines the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains.

We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

### **Organisational structure and supply chains**

Bayford & Co Ltd. operates the Bayford Group, a group of diverse entrepreneurial companies across hospitality, property and energy sectors.

### **Policies**

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies, detailed in our Employee Handbook, set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

- 2.1 **Whistleblowing policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Code of Ethics** - The Code of Ethics sets down the actions and behaviour expected of employees when representing the Company.
- 2.3 **Anti-Slavery policy** – details our commitment to acting with integrity in all business relationships, implementing and enforcing effective processes to ensure slavery and human trafficking is not taking place in our supply chains.

## **Risk Assessment and Due Diligence Processes for Slavery and Human Trafficking**

Bayford & Co Ltd. considers itself to be low risk in relation to slavery and human trafficking in its part of the supply chain. The company HR department applies stringent Right to Work checks on all employees, ensuring original documentation is seen and verified by a member of the management team.

The Company also undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations to business partners. We expect each entity on the supply chain to have suitable anti-slavery and human trafficking policies and processes and to adopt 'one up' due diligence on the next link in the supply chain, as it is not practical for all participants to have a direct relationship with all links in the supply chain.

We will evaluate the modern slavery and human trafficking risks of each new supplier, Bayford & Co Ltd. will not support, or deal with, any business knowingly involved in slavery or human trafficking.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking, in our supply chains and our business, all Directors and employees are briefed on the subject.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the current financial year. It has been approved and authorised by:

Name:	Chris Ritchie
Position:	Operations Director
Date:	July 2023