



Modern Slavery Act Statement 2023

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1. Purpose

The information in this statement details the policies, processes and actions we have taken to ensure that slavery and human trafficking are not taking place in our supply chains or any part of our own business. It covers the activities of all subsidiary businesses within Robertson Group Holdings Limited and is our Modern Slavery statement for 2023/2024 reflecting on the financial year 2022/ 2023 as required under the provisions of the Modern Slavery Act 2015 (the "Act").

2. Responsibility

Barlows UK Ltd are committed to playing our role in eradicating Modern Slavery in all its forms from our business and supply chain. We are taking the appropriate steps to ensure that everyone who works for Barlows UK Ltd benefit from a working environment in which their fundamental human rights are respected and anyone that we do business with also upholds these principles.

3. Scope

Barlows UK Ltd employ over 600 workers and have a supply chain of less than a 100 approved Sub - Contractors and Suppliers. Barlows UK Ltd and our contractors and suppliers are committed to meeting both legal and ethical standards in their daily operation. As a minimum, we expect both ourselves and our Sub - Contractors and Suppliers to comply with all applicable local laws and regulations providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically and using environmentally responsible practices where practicable. Our Sub-Contractors and Suppliers must follow our Code of Conduct that sets out these requirements detailing the basic principles of how we will conduct business in an open, honest and transparent manner, and the behaviours and practices we expect, including a commitment to comply with the Act. Barlows UK Ltd reserves the right to terminate a relationship with a worker or a Sub-Contractor, Supplier or third party that is unable to demonstrate compliance or progress towards the eradication of Modern Slavery within its organisation and supply chain.

4. Information

Barlows UK Ltd conducts due diligence on all of its Workers, Sub-Contractors and Suppliers. This due diligence includes pre-employment checks for workers and the encouragement of subcontractors to be members of third-party approval schemes. We require that our workers complete a right to work check prior to employment. Our Sub - Contractors and Suppliers must confirm to us that:

1. they have taken steps to eradicate Modern Slavery within their business.
2. they hold their own supply chain to account over Modern Slavery.
3. they pay their employees at least the national minimum wage / national living wage (as appropriate).

4. provide an annual update confirming business compliance to key measures identified in this policy.

Barlows UK Ltd will report to the police, take appropriate action to protect the victims of Modern Slavery and Trafficking and ultimately shall enforce its contractual rights should any instances of Modern Slavery come to light. We are fully committed to making sure that no business practices – either internally or through our external supply chain – would contravene Section 54 and/or Clause 5 of the Act, are tolerated.

Additionally, to demonstrate compliance we will review all Sub-Contractors and Suppliers annually and require information on human trafficking and slavery, health and safety, the environment, data protection, information security and bribery.

5. Training

Barlows UK Ltd Managers will be provided with training on the Modern Slavery Act. As partners of the Supply Chain Sustainability School, we continue to utilise industry wide training resources for both our own employees and those of our supply chain. We actively promote engagement in events and briefing sessions which are held by the school along with promoting associated e-learning modules and working to develop Learning pathways to ensure that awareness is maintained across all parties.

6. Additional Policies

Barlows UK Ltd has in place policies and associated procedures to ensure that we are conducting our business in an ethical and transparent manner. These include:

- Modern Slavery Policy and Statement.
- Recruitment policy.
- Whistleblowing policy.
- Responsible procurement policy
- Equal opportunity policy.

Any breach of policy will be regarded as a serious matter and will result in appropriate action being taken.

7. Approval

This statement is made pursuant to Section 54(1) of the Act. The Robertson Group Holdings Limited Board approved this statement on the 30th September 2023. The statement will be reviewed and updated in September 2024.

John Barlow
Managing Director
Barlows UK Ltd