



BGC HOLDINGS

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

Introduction

This document sets out the Human Resource arrangements we have established for each subsidiary company of BGC Holdings Ltd and its associated companies (hereinafter referred to as the ‘Company’).

Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another, in order to exploit them for personal or commercial gain. This document sets out the Company’s policy with the aim of the prevention of opportunities for modern slavery to occur within the Company’s business or supply chain.

The Company has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We expect all who have, or seek to have, a business relationship with the Company to familiarise themselves with our policy and to act at all times in a way that is consistent with our anti-slavery values.

Safeguards

The Company is committed to ensuring there is transparency in our business and expect the same level of commitment with regard to the prevention of modern slavery from our supply chain partners, suppliers and other business partners.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. We are committed to ensuring that no one suffers detrimental treatment* as a result of reporting in good faith, their suspicion that modern slavery or human trafficking in whatever form is, or may be, taking place in any part of the Company business or in any of our supply chain members’ or business partners’ businesses.

*Detrimental treatment includes dismissal, disciplinary action or other unfavourable treatment connected with raising a concern.

Anonymously raised concerns will limit their investigation and will render this process more difficult. Individuals are, therefore, encouraged to put their names to allegations they raise.

Following an investigation, any claims that are deemed to be malicious or vexatious may result in the disciplinary process being implemented.

Reporting Process

Any concerns about suspected modern slavery associated with the Company or our suppliers, may be raised confidentially by employees via their line manager, the HR Director or by other 3rd parties, through a member of the Board of Directors.

In addition, access to a Government 24-hour helpline and website is available to employees and business partners should they prefer this route: modernslavery.co.uk/report-it or 0800 0121 700.

When a modern-slavery matter is raised internally, the Company will treat all such concerns in a confidential and sensitive manner. The identity of the individual raising the concern may be kept confidential, so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required. Following the outcome of the investigation process, the company will inform the relevant statutory body, e.g. local Police Force, should modern slavery practices be suspected.

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Due Diligence, Communication and Awareness of this Policy

In order to identify and mitigate the risk of Modern Slavery occurring we:

- Include this policy in our Employee Handbook and induction pack;
- Raise awareness amongst our employees during the induction process;
- Include this policy on information notice boards on all sites and offices;
- Raise awareness amongst our supply chain during the appointment process;
- Request our supply chain and other business partners to implement their own Modern Slavery prevention procedures.
- Request confirmation upon appointment that they are aware of this policy and will abide by it;
- Encourage the reporting of concerns without detriment to the individual;
- Provide training to relevant members of staff;
- Ensure all Directors and Staff are briefed on the subject.

Responsibility for this Policy

Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations.

Review

Following its initial adoption, this Policy will be reviewed by the Board of Directors on a regular basis and may be amended from time to time.



Signed:

Date: 30.05.2019

Name: Julie Cambray

Position: Managing Director