Ethical Labour Policy

1. Introduction

1.1 This policy applies to Briggs & Forrester (UK) Limited on its own behalf and on the behalf of all its subsidiary companies within the Briggs & Forrester Group Ltd ('the Group').

1.2 This policy outlines our commitment to ethical labour practices and responsible procurement across our operations and supply chains.

1.3 The Group recognises our responsibility to uphold human rights, promote fair labour conditions, and ensure sustainable procurement practices.

1.4 The Group is committed to upholding the rights, wellbeing and dignity of our employees, subcontractors, agencies and suppliers by cultivating a business culture that priorities safety, security, and respect for all individuals.

2. Responsibilities

2.1 The Group Board will ensure that sufficient resources are made available to ensure the effective operation of this policy.

2.2 All employees and supply chain, including contractors, subcontractors, suppliers, vendors and service providers, are responsible for following this policy.

2.3 Procurement and Commercial Teams are responsible for ensuring that this policy is incorporated into supplier and subcontractor selection and evaluation processes.

3. Ethical Labour Commitments

3.1 The Group is committed to:

- No forced or child labour: This includes all forms of modern slavery, human trafficking and child labour.
- Fair wages and working hours: All workers must be paid at least the legal minimum wage and work within legal limits.
- Safe working conditions: All workers must be provided with a safe and hygienic working environment.
- Freedom of association: Workers must be free to join trade unions and engage in collective bargaining.
- Non-discrimination: Employment decisions must be based on merit and not on race, gender, religion, age, disability, or other protected characteristics.
- Responsible sourcing: Supply chain will be prioritised who demonstrate ethical and sustainable practices.

- Promoting transparency: The Group will publish its modern slavery and human trafficking transparency statement annually. Our supply chain should also freely disclose and share information about their labour practices and supply chain risks.
- Local engagement: Where feasible, local suppliers and SMEs will be utilised to help support regional economic development.
- Assessing risks: Due diligence and risk assessments will be conducted for procurement in high-risk categories or geographies.
- Monitoring compliance: Monitoring of our supply chains' policies, certifications and accreditations with respect to ethical labour (i.e. Occupational Health & Safety, Environmental, Modern Slavery etc.) and, where necessary, conducting ethical audits within our own operations and that of our supply chain.

4. Adherence to Ethical Labour Principles, Labour and Employment Laws and Regulations

4.1 All employees and supply chain (contractors, subcontractors, suppliers, vendors and service providers) will:

- Commit to and adhere to the content of our Ethical Labour Principles.
- Adhere to this policy and applicable labour and employment laws and regulations
- Cooperate with audits and provide documentation upon request

5. Implementation of this Policy

5.1 To support the implementation of this policy the Group will:

- Ensure policies are in place that enable the delivery of ethical labour practices across our operations, including those concerned with relevant labour and employment laws, modern slavery and human trafficking commitments and obligations
- Ensure that this policy and the Group's Ethical Labour Principles are communicated and publically available to all relevant parties
- Maintain and continually improve the Group's occupational health and safety and environmental management systems
- Carry out due diligence assessments within our own business and our supply chains
- Ensure that anonymous whistleblowing systems are in place to allow for the reporting of any suspected or actual unethical practices
- Investigate all unethical reports and take appropriate corrective and preventive actions
- Work in collaboration with clients, employees, supply chains, the authorities, the GLAA and other relevant parties to improve ethical labour and procurement practices.
- Ensure that relevant staff receive appropriate training to support the effective operation of this policy.

6. Related and supporting policies, procedures and other documents

6.1 This policy is supported by other Briggs & Forrester Group Policies and documents:

- Ethical Labour Principles
- Modern Slavery & Human Trafficking Policy
- Whistleblowing: See Hear Speak Up Policy
- Health, Safety & Work Safe Policy
- Wellbeing Policy
- Equality, Diversity & Inclusion Policy
- Bribery and Corruption Policy
- Family Friendly Policies
- Sustainability Policy
- Sustainability Strategy
- Environmental Policy
- Waste Management Policy

7. Communication of This Policy

7.1 A copy of this policy is accessible to all interested parties via the Group website.

7.2 A copy of this policy is available to all employees through the Group Hub Document Library (intranet).

7.3 All directly employed staff are required to read and understand the requirements of this policy.

8. Review and Updating of This Policy

8.1 This policy will be reviewed and updated, at least annually, and amended as necessary to reflect any changes to the Group, its management systems, business activities, best practice, stakeholder feedback or relevant legislation.

Paul Burton
Group Chairman and Chief Executive