



Modern Slavery and Illegal Workers Policy

1. Policy Statement

Barons Group is committed to preventing modern slavery, human trafficking, forced labour, compulsory labour, servitude, and the use of illegal workers within our business operations and throughout our supply chains.

We recognise our responsibility to act ethically and with integrity in all business dealings and to implement effective systems and controls to identify, prevent, and mitigate the risk of labour exploitation. This policy reflects our commitment to the principles of the **Modern Slavery Act 2015** and forms part of the Barons Group Integrated Management System.

Barons Group adopts a zero-tolerance approach to any form of modern slavery or illegal working.

2. Scope and Application

This policy applies to all activities undertaken by Barons Group, including but not limited to construction works, network infrastructure, electrical installation, facilities management, maintenance, compliance services, and site-based operations.

The policy applies to:

- All employees of Barons Group
- Subcontractors, suppliers, and service providers
- Agency workers and labour providers
- Business partners and consultants

All parties working on behalf of Barons Group are required to comply with this policy and uphold the same ethical standards.

3. Legal and Regulatory Framework

This policy supports compliance with, but is not limited to:

- The **Modern Slavery Act 2015**
- Immigration, Asylum and Nationality legislation
- UK employment law and labour standards
- Relevant Home Office right-to-work guidance

Failure to comply with these legal requirements may result in disciplinary action, contract termination, and reporting to relevant authorities.

4. Risk Assessment and Industry Context

Barons Group acknowledges that the construction and facilities management sectors present an increased risk of modern slavery due to:

- Use of subcontracted and agency labour
- Site-based and temporary working arrangements
- Multi-tier supply chains

We adopt a risk-based approach to identifying and managing these risks, taking into account:

- Nature of services provided
- Labour sourcing methods
- Geographic and operational risk factors

Risk assessments are reviewed regularly and when business activities or supply chains change.

5. Due Diligence and Supply Chain Management

Barons Group undertakes appropriate due diligence to ensure that suppliers, subcontractors, and labour providers operate ethically and lawfully.

This includes:

- Pre-engagement checks on labour providers and subcontractors
- Requirement for suppliers to comply with anti-slavery and employment legislation
- Inclusion of ethical and right-to-work obligations within contractual arrangements
- Ongoing monitoring of supplier performance where appropriate

Where concerns are identified, Barons Group will take proportionate action, which may include investigation, remediation, or termination of contracts.

6. Illegal Working and Right-to-Work Controls

Barons Group operates robust right-to-work procedures to prevent illegal working.

We will:

- Conduct right-to-work checks in accordance with Home Office guidance
- Verify and retain appropriate documentation before employment or engagement
- Carry out repeat checks where required
- Address and investigate any suspected breaches promptly

We will not knowingly employ or engage any individual who does not have the legal right to work in the UK.

7. Training and Awareness

Relevant employees involved in recruitment, procurement, and site management receive guidance and awareness training to help them:

- Understand the risks of modern slavery and labour exploitation
- Identify indicators of forced labour or illegal working
- Know how and where to report concerns

Training and awareness activities are reviewed periodically to ensure ongoing effectiveness.

8. Reporting Concerns and Whistleblowing

Barons Group encourages the reporting of any concerns relating to modern slavery, human trafficking, or illegal working.

Concerns may be raised:

- Through line management
- Directly with senior management
- Via whistleblowing arrangements

Reports can be made confidentially and without fear of retaliation. All concerns will be taken seriously, investigated promptly, and handled sensitively.

9. Breaches and Enforcement

Any breach of this policy by an employee may result in disciplinary action, up to and including dismissal.

Any breach by a subcontractor, supplier, or business partner may result in:

- Contractual action
- Termination of engagement
- Reporting to relevant enforcement authorities where appropriate

10. Monitoring, Review and Continuous Improvement

The effectiveness of this policy is monitored through:

- Management review
- Supplier and labour provider oversight
- Incident and concern reporting trends

This policy is reviewed annually, or sooner where required, to ensure it remains effective, legally compliant, and aligned with best practice.

Approval and Governance

Company: Barons Group

Address: 3 Elmfield Road, Bromley, BR1 1LW

Approved by: Adam Simmons – Managing Director

Approval Date: 5 January 2025

Review Cycle: Annual or upon significant change