

**BCN****Slavery & Human Trafficking Statement**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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.

BCN is committed to ensuring that slavery or human trafficking is not taking place in any part of our supply chain or in any part of our own business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes BCN's slavery and human trafficking statement for the financial year ending April 2024

This Statement details BCN's response to the Modern Slavery Act 2015 and we ensure the majority of suppliers we use are UK based, working within the parameters of needing a Modern Slavery Statement. Those not needing a statement tend to be in consultancy or recruitment and who are not reliant on a supply chain. and offers an outline of key areas where Slavery and Human Trafficking are deemed a higher risk area for potential prevalence within the BCN's supply chain.

**Organisational structure**

BCN is a leading digital transformation and technology solutions provider, delivering a range of managed IT services including application development, infrastructure and cloud, cybersecurity, data analytics, and more. As one of the UK's most qualified Microsoft Solutions Partners, BCN delivers best-in-class Microsoft technologies, technical support and expertise to more than 1,600 customers.

With a HQ in Manchester and offices in Reading, London, Belfast and Leeds, BCN employs a team of over 450 people.

BCN's values are entirely consistent with the aim of eliminating slavery. Our work is inspired by a commitment to human equality and dignity, democracy and mutual respect. We aim for equal opportunity and real inclusion in all our activities. We promote sustainable development and active community engagement. We believe that every individual matters and aim to help all our staff and partners make the most of their own rich potential.

## **Our Policies**

We operate and regularly review workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains.

Some of BCN's policies that support our approach to tackling modern slavery and human trafficking include:

### **Whistleblowing Policy**

BCN is committed to maintaining the highest standards of honesty, openness, and accountability and to conducting its business in a responsible way. The policy encourages employees to raise their concerns in a responsible way where there is malpractice (that is, illegal, improper, or negligent behaviour) or wrongdoing within an organisation and, where they do so, protects those employees from reprisal.

### **Health & Safety Policy**

This sets out the expectations on employees to support BCN's efforts to provide a safe and healthy workplace and to meet their own individual duty of care to others.

### **Equality Opportunities Policy**

The policy outlines the Universities commitment to equality of opportunity and is opposed to all forms of discriminatory practices and attitudes.

The policies are available via our intranet site and website, and training in equality and diversity is mandatory for all new staff, and compulsory for all staff to revisit the training at regular intervals during their employment.

### **Our supply chains**

BCN is one of the largest IT Support businesses in the North West and recognises that it has a responsibility to minimise the environmental and social impact of purchased goods and services. BCN purchases a wide range of external goods and services in support of our activities, primarily from suppliers within the UK.

### **Due Diligence in our processes**

The purchasing team are responsible for identifying, monitoring and mitigating areas of potential risk, including the risk of slavery and human trafficking. To ensure suppliers are aware of our values, our Modern Slavery statement is available via the BCN.co.uk website, where appropriate our supplier onboarding requests confirmation of a suppliers commitment to the Modern Slavery Act, including requesting copies of supplier Modern Slavery statements/policies. BCN has a zero tolerance to slavery and human trafficking and have updated our standard terms and conditions to mandate compliance to the Modern Slavery Act 2015.

Suppliers are required to declare their compliance with the Act. The documents provide provisions to terminate the contract should a supplier be found to be in breach of the conditions outlined.

**Training and awareness raising**

Within the purchasing team, as the area most actively engaged in BCN's operational response to the Modern Slavery Act 2015, all members have completed training. BCN will continue to ensure that those who are involved in activities in which modern slavery and human trafficking could be an issue will continue to receive support and training, BCN will continue to generally raise awareness across the organisation.

**Plans for the future**

BCN intends to take the following further steps to combat slavery and human trafficking.

- Continue to better understand our supply chains and work towards greater transparency.
- Ensure all contracted suppliers have signed up to and are complying with our terms and conditions which include commitments relating to the Modern Slavery Act 2015.
- Continue on an annual basis to review this statement and look at ways to enhance.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

**Actions Taken during the reporting year**

The purchasing manager has embedded where appropriate into onboarding and tender processes to help suppliers make positive changes to their organisations and demand better through their supply chains.

Rob Davies  
CEO  
BCN Ltd

Date: March 2025

## Document Title

# Modern Slavery Policy

## Document Revision

Reference	Version	Modified Date	Author(s)	Comments
QMS-225	5	April 2025	Hannah Dodson	Annual review

## Document Management

Responsibility	Owner
Operations Director	Talent Acquisition and HR Manager

## ISO Applicable?

ISO	Clauses	27001:2022 - Annex Controls
9001:2015		
27001:2022		

## Confidentiality

BCN Group Ltd	Client	Proprietary	Public
No	No	No	Yes

Used in IO
No

### Document reference key

QMS – 9001 – Quality Management System  
ISMS – 27001 – Information Security Management System  
IMS – 9001 & 27001 – Integrated Management System  
BCN – BCN process or procedure

Read Only Copy – See Policies & Procedures repository for latest revision.