

Modern Slavery & Human Trafficking Policy and Statement  
(Issued: 01 September 2025 – Next Review: 01 September 2026)

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#### 1. Introduction

Byrecroft Ltd recognises that modern slavery and human trafficking are serious global issues affecting millions of people. We are committed to taking a proactive stance to ensure that modern slavery has no place within our operations or supply chains.

This document sets out our policy on modern slavery and human trafficking in accordance with the UK Modern Slavery Act 2015, Section 54 (Transparency in Supply Chains).

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#### 2. Our Business

Byrecroft Ltd is a privately owned construction company registered in England & Wales (Company No. 16650513) with its head office in Northallerton, North Yorkshire. Our core operations cover:

- Developments – residential new builds, extensions, refurbishments.
- Kitchens – design, supply, installation.
- Flooring – timber, laminate, LVT, and commercial/domestic flooring.

We employ a mixture of directly employed staff, apprentices, subcontractors, and agency labour. Our supply chain includes UK-based merchants, distributors, and occasional international suppliers of materials (e.g., timber, tiles, appliances).

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#### 3. Policy Statement

Byrecroft Ltd has zero tolerance towards modern slavery, human trafficking, forced labour, or child labour. We are committed to:

- Acting ethically and with integrity in all our operations.
  - Ensuring transparency in our business and supply chains.
  - Implementing systems to safeguard against any form of exploitation.
  - Engaging only with suppliers and subcontractors who share these values.
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#### 4. Governance & Responsibility

- Board of Directors – Overall accountability for modern slavery compliance.
  - Operations Director – Day-to-day responsibility for ensuring policies are implemented on all projects.
  - Commercial & Procurement Team – Responsible for conducting supplier due diligence.
  - All Employees & Subcontractors – Required to understand, comply with, and raise concerns about suspected modern slavery.
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#### 5. Policies Supporting this Commitment

We operate the following supporting policies:

- Recruitment Policy – Ensuring all employees have the legal right to work in the UK and are employed directly, without recruitment fees.
  - Supplier Code of Conduct – Outlines our expectations for suppliers regarding labour standards, wages, and ethical practices.
  - Whistleblowing Policy – Enables concerns to be raised confidentially without fear of reprisal.
  - Health & Safety Policy – Ensures safe and fair working environments.
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## 6. Supply Chain & Risk Assessment

### Key Supply Chain Risks in Construction:

- Use of subcontracted or agency labour.
- Procurement of materials (timber, tiles, stone, metals) from overseas markets with higher prevalence of forced labour.
- Lower-tier suppliers (where visibility is harder to maintain).

### Risk Assessment Process:

- Annual review of supply chain by Directors.
- Supplier pre-qualification questionnaires (PQQs) to assess compliance.
- Risk rating system:
  - High Risk: Labour agencies, overseas suppliers.
  - Medium Risk: UK distributors of imported materials.
  - Low Risk: Directly employed UK staff.

### Mitigation Measures:

- Contract clauses requiring compliance with Modern Slavery Act.
- Refusal to work with suppliers who cannot demonstrate compliance.
- Spot checks on labour practices on site.

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## 7. Due Diligence Procedures

- Verify right-to-work documents for all employees.
- Require all subcontractors to provide evidence of modern slavery compliance.
- Maintain an approved supplier list, reviewed annually.
- Introduce supplier audits for higher-risk categories.
- Use standardised PQQ and contract terms aligned with Constructionline and CHAS requirements.

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## 8. Training & Awareness

### We provide training for management and staff covering:

- Recognising signs of modern slavery.
- Reporting procedures.
- Roles and responsibilities in maintaining compliance.

Training is reviewed annually and cascaded through toolbox talks, induction sessions, and subcontractor briefings.

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## 9. Reporting Concerns

Employees, subcontractors, and suppliers are encouraged to report any concerns regarding modern slavery:

- Internally: Report to the Operations Director.
- Externally: Report to the Modern Slavery Helpline (0800 0121 700).

All reports will be investigated, and appropriate corrective action taken.

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## 10. Key Performance Indicators (KPIs)

### We will monitor our effectiveness by tracking:

- % of suppliers vetted for modern slavery compliance.
- % of subcontractors who have signed the Supplier Code of Conduct.
- Training completion rates for staff and managers.
- Number of concerns raised and resolved.

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## 11. Review & Continuous Improvement

### This policy will be:

- Reviewed annually by the Board of Directors.
- Updated to reflect changes in legislation, business activity, or identified risks.
- Published on our website and available to clients upon request.

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Approved by the Directors

Byrecroft Ltd

Date: 02 September 2025

Signed:

Name:

Marc Thiar