

## Policy Booklet

### Statement on Modern Slavery and Human Trafficking

Bauer Technologies Limited (BTL) is a wholly owned subsidiary of Bauer Spezialtiefbau GmbH (BST). BST is a leading specialist foundation contractor based in Schrobenhausen, Germany that works worldwide. BST is part of the BAUER Aktiengesellschaft Group (BAG) of companies, and it is a certified member of the EMB Wertemanagement Bau e.V. BAG is a public company listed on the Deutsche Bourse. In 2020, the companies that comprise BAG employed more than 10,900 people drawn from 82 nations worldwide.

BTL is a specialist foundation contractor working in the UK construction industry based in Bishops Stortford, Hertfordshire. It has been active in the UK market since 2007. BTL is a supplier to both public and private sectors and it specialises in the design and construction of complex, technically challenging projects in all regions of the United Kingdom. In the financial year ending 31st December 2021, BTL reported a turnover more than £8m.

The Senior Management Team of BTL recognises the existence of Modern Slavery and Human Trafficking in our industry and in the Supply Chain. It unanimously agrees that the misery and hardship these practices inflict on those who are exposed to it have no place in a modern, sustainable business. Bauer core values are personal responsibility, reliability, and correct behaviour: these values underpin our actions and are part of our culture.

BTL already has several policies and minimum requirements established that form part of an approach to Modern Slavery. These include:

- Corporate Responsibility Policy.
- Ethical Trading Policy.
- Communities & Social Reporting.
- Fraud & Corruption Policy.
- Whistleblowing Policy.
- Equality, Diversity, and Inclusion Policy.
- Recruitment Policy.
- Validation of all employees and construction workers' right to work.
- Minimum training standard for Health and Safety at the workplace for all construction workers on our sites.
- Key construction materials to be responsibly sourced and supplied with responsible sourcing certificates, such as FSC/PEFC for timber.
- Clear and transparent contracts of employment for all employees.
- Employee Handbook and Guidance for employees.
- Sustainability Policy.
- Procurement Policy.
- All construction workers on BTL sites to be paid in alignment with local standards, such as the Construction Industry Joint Council Working Rule Agreement or the Living Wage.

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In 2022, BTL intend to:

- As part of our due diligence, our subcontractor/supplier approvals process will incorporate a review of the controls undertaken by the subcontractor/supplier to minimize the risk of modern slavery or human trafficking issues.
- Collaborate with and share best practice through representation in Build UK, the Federation of Piling Specialists, and appropriate Tier 1 contractor and Stakeholder engagement.
- Ensure that businesses we work with in our Supply Chain comply with the Modern Slavery Act, and that they in turn, pass such requirements on to their Suppliers.
- Include mandatory contractual terms mandating adherence to statutory employment obligations in our key labour supply Agency Agreements and undertake annual Audits.
- Communicate our statement on Modern Slavery and Human Trafficking via our website, internally to our employees, externally via LinkedIn & through the Government Modern Slavery Registry
- Publicise internally the confidential communication channel for whistle-blowers in accordance with our Employee Handbook.

To assure continued relevance and to respond to a changing business environment, the Board is committed to keeping policies and procedures under regular annual review. This Statement is made in discharge of our obligation under the UK Modern Slavery Act 2015.



Michael Jones  
Managing Director  
April 2022