

## MODERN SLAVERY STATEMENT

BWHL has taken steps to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

References to "our people" only refers to those individuals working on behalf of BWHL. In accordance with Section 54, Part 6 of the Modern Slavery Act 2015 (the Act), this statement sets out the steps that BWHL has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business. This statement is in respect of BWHL's financial year ended 31 December 2023 and was approved by the BWHL Managing Director on 01 July 2024.

### Overview

The Act requires commercial organisations supplying goods or services with a turnover of more than £36 million to prepare and publish an annual 'Slavery and human trafficking statement'. The statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its business or supply chain.

### What is modern slavery?

Modern slavery is an international crime, affecting millions of people around the world - a growing global issue that transcends age, gender, and ethnicities. Sadly, vulnerable people from overseas as well as across the UK, are forced to work illegally against their will across many different sectors from agriculture, construction, hospitality, retail, manufacturing, and more.

### Our organisation structure and supply chains

BWHL is a private company limited by guarantee, incorporated in England and Wales and is the holding company for Brightwell Dosing Limited and Brightwell Dosing Limited Trading as Hylab UK Ltd that manufactures plastic dispensers and dosing equipment for the cleaning industry. The business operates from locations in:

- United Kingdom
- France
- Spain
- Germany
- United States of America

Our businesses employ local full time and agency workers who are employed directly by Brightwell Dosing Limited and Brightwell Dosing Limited Trading as Hylab UK Ltd. Our people policies ensure fair treatment of our people around the world.

Our external suppliers are both local and global companies operating in low risk sectors.

**Our policies in relation to slavery and human trafficking**

BWHL has established a zero-tolerance position on violations to the UK's anti-human trafficking and anti-modern slavery laws. If we find breaches of these laws within our supply chain, we will look to support companies in their efforts to comply with the legislation.

Our Core Values (Accountable Ambition, Integrity, Passion to Excel, Collaborative Success, Curiosity and Creativity and Supportive Inclusion) are the pillars of our culture. They embody everything that we do at BWHL and how we do business. They outline the expectation of our people's behaviour with colleagues, customers, suppliers, and people around the world.

We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent, and trusted. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values.

Our specific procedures to address modern slavery risk include:

- A 'Modern slavery policy' for our people, which sets out the key issues and how we should respond including a process for raising concerns internally
- The handling of complaints raised by people outside of BWHL
- Employment policies that protect our people from unfair treatment and promote a fair and inclusive workplace
- Robust recruitment processes in line with relevant employment laws
- Market-related pay and rewards reviewed periodically
- Wellbeing strategy and initiatives to support our people's physical and mental wellbeing and lifestyle choice
- A 'Procurement Policy' for how we deal with suppliers and a 'Supplier Code of Conduct' making clear the standards we expect

**Due diligence processes, risk assessment and management**

The implementation of our policies and procedures includes due diligence on suppliers that we engage with, in accordance with our procurement policy. To mitigate against this risk, we assess the companies that we deal with as part of the decision making process for approved suppliers.

When we approve a new supplier, a thorough due diligence process takes place to ensure that the supplier has a good reputation with appropriate practices in a number of areas including people and culture. Once a supplier is approved by BWHL, compliance with our policies is a condition of maintaining the approved status.

**Key performance indicators to measure effectiveness of steps being taken**

We log complaints received via our reporting system or through other sources, together with the actions taken. To the date of this statement, BWHL has had no identified instances of modern slavery being reported.

## **Training on modern slavery and trafficking**

BWHL provides periodic training (iHasco) to our people on the subject of modern slavery and our policies to address the risks to help increase education and awareness.

If you would like to find out more about the above, please email [hr@brightwell.co.uk](mailto:hr@brightwell.co.uk).

BWHL takes responsibility for this Statement and its related objectives and will review and update it in accordance with The Act.

Updated 01 July 2024



Nathan Palmer

**Managing Director** - BWHL Group Ltd

