



Design : Create : Inspire

Modern Slavery Act Statement

The Modern Slavery Act requires companies to produce a statement that describes what actions they are taking to address modern slavery in their operations and supply chains. This is not intended to be, and should be approached, as a compliance exercise. Rather, companies are encouraged to take the necessary time and effort to consider their existing processes and practices related to modern slavery, as well as labour standards more generally. An effective, informative and substantive statement will address and report on modern slavery in the context of a broader human rights due diligence context.

The Modern Slavery Act 2015 came into effect on 29th October 2015. The Act requires Corporate Companies supplying goods or services to the UK, and who have an annual turnover exceeding £36 million, to disclose information regarding their policies to eradicate all forms of slavery (including child, bonded & forced prison labour) and human trafficking. Section 54 of the Act specifically requires a Corporate Company to demonstrate ethical transparency within their supply chain, and within their business.

Supply chain ethics

Human Rights are fundamental principles which allow an individual to lead a dignified and independent life, free from abuse or violations. These values are embedded in quality companies and businesses throughout the UK and BBS Natural Stone will not allow any drop in these standards or allow deviation from these principles throughout our supply chains. Any violation of the principles will be fully investigated and acted upon. Throughout its entire supply chain, BBS are aligned with the representative standard for Corporate Companies to demonstrate the practice of Business and Human Rights. These standards are outlined within the UN Guiding Principles for Business and Human Rights which is a framework based on Protect-Respect-Remedy which prohibits slavery (including child, bonded & forced prison labour), and human trafficking. Our continuous work with NGOs and Trade Unions around the globe ensure our work is supported by the correct standards and is independently verified.

BBS are a market leader in Freedom of Association, and have worked extensively throughout our supply chains to ensure all individuals making up our chain are aware of their rights regarding union membership and elected representation. All sections of our chain have received language specific documents from BBS explaining the right to be a member of a union, their human rights and electing representation within the workplace.

In China, BBS are working closely with the All China Federation of Trade Unions (ACFTU) at a local level. Union membership is permitted in China and the vast majority of workers are affiliated to the ACFTU. Our successes at a local level include highly focused working groups, who have been able to elect workplace representation and install suggestion boxes which are addressed at monthly meetings. As part of our continuing capacity building, BBS have two teams trained by the Ethical Trading Initiative who are continually on hand to assist all local workers with any issues that may arise.

BBS are also working with the London based Trade Union Congress (TUC) to gain advice and information on new and innovative ideas and are also working with the International Transport Federation (ITF) looking at the logistics links in our supply chain.

Meetings with freight forwarding companies and dock workers union representatives in Europe, has enabled BBS to build on ensuring we get to as many individuals as possible and make sure they are aware of all their rights.

Our work with the (ITF) allows us to have independent and verified checks carried out on all our shipping vessels through Europe. These checks are constructed to check for fair human rights due diligence across supply chains and undertaken as part of companies' supply chain accountability.

The zero-tolerance policy towards slavery adopted by BBS Natural Stone is part of our Ethical Stone Register (ESR) reporting. As part of our globally accepted auditing procedures the ETI Base code is the centre of where our work begins, and aligns perfectly with the ESR.

BBS Natural Stone are a global company with long-standing supply chain relationships around the world, including China, Vietnam, India, Spain, Italy and Portugal. Our sources are varied and diverse meaning we understand cultural differences and how these tie into our expected standards. Our supply chains, without exception, have been issued with clear and fundamental standards of acceptability to BBS as set out in our structured due diligence framework, and we are continuously striving for higher ethics through dialogue and training to create a team ethos throughout our chain. We expect our suppliers not to be involved in forced, bonded, or indentured labour, child labour, involuntary prison labour, slavery, or trafficking of persons of any age at any tier of the supply chain. This includes transporting, harbouring, recruiting, transferring, or receiving or persons by means of threat, force, coercion, abduction or fraud for labour or services. Suppliers, as employers or agents, may not hold or destroy employees' identification or immigration documents, such as passports or work permits, unless required by law. Employers and agents may not use misleading or fraudulent practices during the recruitment of employees. Workers must not be required to pay employers' or agents' recruitment fees or other related fees for their employment. Workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment and any hazardous aspects of the work. Employers must not use threats of violence, harassment, and intimidation, or restrict workers' freedom of association or freedom of movement within or outside of company workplaces or facilities. All work, including overtime, must be voluntary, and workers shall be free to terminate their employment and leave work at any time.

Going forward

Risks, objectives and planned actions (KPI's) October 2023 – October 2025

At BBS, we have identified two objectives and planned actions to address these risks. The supply chain objectives build on previous work in these areas and the programme objectives seek to address the increasing global numbers of people held in modern slavery and those on the move who are more vulnerable to harm. We will report against these commitments over the next two years.

Risk 1.

The increase in global figures of people held in modern slavery, added to an increase in numbers of people on the move indicate an increased risks of forced labour in international supply chains.

Objective.

Continue to monitor our supply chains at all levels, with the assistance of internationally recognised bodies, such as the ITF and the UN. Drawing on international labour and human rights law, including sector-specific standards like the ILO Maritime Labour Convention (MLC), UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Planned action.

Carry out further maritime health checks through the ITF on an annual basis, and continue with locally based worker interviews and meetings by BBS and our independently ethically trained teams.

Risk 2.

High numbers of temporary, seasonal, or agency workers.

Objective.

Build on the effective grievance mechanisms and representative workers' organisations/collective agreements already in place in China and Europe.

Planned action.

Increase the number of supply chain management trained in this area, giving all workers greater visibility to their employers.

Our employees

BBS Natural Stone holds regular in-house training for all employees, enabling everyone to be up to speed with the latest initiatives and guidelines. This training is delivered by Kevin Hives during Sales Meetings and Staff Meetings at our locations throughout the UK. Our commitment at BBS Natural Stone in expanding and encouraging knowledge on human rights, ethical trading and modern slavery is continuous. BBS Natural Stone continually review and update its policies and procedures as required, to ensure it continues to put workers first. Working with the ESR, NGOs, Trade Unions and associated ethical advisories and collaborating with other UK companies, BBS Natural Stone will continue to inform on its ethical trading around the world.

Kevin Hives – Director

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