



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.

Progression from objectives set for October 2023 – October 2025

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.

Results.

Throughout the last 2 years BBS has been implementing change and can confirm the following:

- Kevin Hives (Sales Director) has been appointed Ethics and Sustainability Officer for the BBS group. The appointment has given even sharper focus on the continuous growth at BBS within this vitally important field.
- During the reporting period, BBS have become members of the Internationally recognised Sustainability School, which will continue and develop our learning and application of our goals.
- BBS have worked closely throughout the last 24 months with the International Transport Federation (ITF) continuing to have our supply chain logistics checked inline with the ITF vision – “We work for a world where all workers are treated equally – with dignity and respect; where everyone can work in a safe environment free from fear and discrimination; and where each worker is paid a fair and decent wage. We’re moving forward, together. We’re driving a future that’s better”

The results received back to BBS, have shown that 97% of our vessels carrying our imported stone held a clean review. BBS will continue to work with the ITF and its 4-step programme, to push for a 100% result. All information gathered by the ITF showing issues outside of the acceptable standard is logged however small, and these issues will contribute to the overall results. It is the intent of BBS to eliminate, wherever possible, the smallest of issues and strive for the 100% result.

A FOUR-STEP GUIDE TO COOPERATING WITH THE ITF ON HUMAN RIGHTS DUE DILIGENCE



STEP ONE AN INTRODUCTION TO COOPERATIVE MARITIME HUMAN RIGHTS DUE DILIGENCE

An Introductory meeting with the ITF to discuss worker-centred HRDD approaches to your transport and logistics supply chains. The ITF can help support the effective communication of the risks to seafarers' rights and HRDD requirements across corporate teams. Shared principles and approaches to HRDD are agreed, including recognition that freedom of association and collective bargaining are enabling rights that make it possible to promote and realise decent work.



STEP TWO ITF RIGHTS CHECK

Request a confidential ITF Rights Check for seafarers. Agree to share information on ships carrying your cargo to inform an ITF assessment of human rights risks to seafarers on those vessels over a specified period.



STEP THREE DIALOGUE ON RISKS AND MITIGATION

Dialogue with the ITF on the risks identified within the ITF Rights Check for seafarers and suggested actions. Engage and update business policies related to HRDD.



STEP FOUR ITF COOPERATION AGREEMENT

- Cooperate with the ITF to prevent or remedy actual or potential human rights violations in maritime logistics, early, directly and in a manner acceptable to the affected seafarers – in line with the UN Guiding Principles.
- Undertake regular Rights Checks for seafarers.
- Map your whole transport and logistics supply chain, with the possibility of expanding ITF Rights Checks to other parts of your supply chain.
- Recognise the ITF and its affiliates as representatives of transport workers, and collaborate to address actual and potential impacts on transport workers' rights, including labour rights.

Risk 2.

High numbers of temporary, seasonal, or agency workers.

Results.

During our regular visits to our supply chain teams in, we have been holding worker interviews to discuss standards and fairness. These discussions were open and freely attended with the workers (permanent and temporary) able to speak in confidence about their working lives. BBS are happy to report that these meetings were 100% positive and were officially recorded by BBS and the supply chain partners. In addition to the previously implemented grievance mechanism files, all supply chain partners are now fully furnished with operational grievance mechanism systems which are accessible by all workers. This means that the owners, management, and workers understand how to address any workplace issues, and report on them accordingly. These documents and files are accessible by BBS at any given point. This clear and trusted system has is now embedded within our supply chains, and will be monitored going forward.

The supply chain partners are now trained in this area, and are able to correctly and confidently approach any issues which may arise. BBS will continue to monitor the suppliers and how the system is managed in the coming years.

Going forward

Risks, objectives and planned actions (KPI's) October 2025 – October 2027

At BBS, we have identified two objectives for the new reporting period, and have planned actions to address these risks. The supply chain objectives build on previous work in these areas and the programme objectives seek to address workers' rights within our logistics supply chain along with increasing the focus on Modern Slavery. 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. This is an extension to a previous risk, where we will look into the road haulage element of our suppliers logistics operation, in addition to the sea based shipping already reported.

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 Road Transport Due Diligence (RTDD) The RTDD Foundation's worker-centred approach to supply chain monitoring is improving conditions for truck drivers while helping customer companies comply with their due diligence obligations. Plus the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Planned action.

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

Risk 2.

The possibility of new legislation and information not reaching all staff/team members at BBS.

Objective.

To enhance the Ethics and Sustainability role within BBS, and add new members to the team. An increased training programme will be developed at BBS and rolled out across the team, with new information added on a regular and structured basis. Kevin Hives will be responsible for ensuring the information is detailed out to the team.

Planned action.

New training programmes to be developed at BBS and delivered to the team and the supply chain. A new addition to the BBS ethics and sustainability team will be announced.

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

October 2025

Progression updates to be published October 2027.



INTERNATIONAL
TRANSPORT
WORKERS'
FEDERATION