



MODERN SLAVERY AND HUMAN TRAFFICKING

POLICY STATEMENT



Cleveland Bridge UK Ltd
Cleveland House, Yarm
Road, Darlington,
County Durham UK, DL1 4DE

+44 (0)1325 381188
info@clevelandbridge.com
clevelandbridge.com



www.clevelandbridge.com

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

This statement is made pursuant to Section 54, part 6 of the Modern Slavery Act 2015 and sets out the steps that Cleveland Bridge UK Limited ("CBUG") are taking to ensure that slavery and human trafficking is not present in our company or our supply chain.

Our Business

Modern slavery is a heinous crime and businesses have a vital role to play in identifying and ultimately preventing modern slavery and human trafficking in our supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. CBUG has a zero-tolerance approach to any form of modern slavery.

We are committed to acting with integrity and in adherence to legislation and ethical good practice. We are fully committed to conducting our business with full respect for the human rights of our employees, agency staff members and subcontractors.

Policies

All employees have a responsibility to comply with the CBUG Code of Conduct. Part of this responsibility is being aware of modern slavery red flags both on site and within company or subcontractor facilities.

Employees have an obligation to report any concerns using the guidance set out in CBUG's Speak Up Policy.

To assist our employees with this requirement, CBUG have provided Modern Slavery Awareness Training. This training has been provided for all members of the Operational Management Team and, in addition, has been provided to all Project Managers, Construction Managers and procurement team members, so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Risk assessment and Due Diligence

We revisited our risk assessment and concluded that our most significant risks remain in our material and subcontractor procurement. CBUG have a wide range of policies, processes and procedures to ensure that we conduct business in an ethical and transparent manner.

We operate a preferred supplier list and conduct due diligence on all suppliers before they are approved. Suppliers that are based in high risk jurisdictions are subject to enhanced due diligence and are required to provide evidence of policies, processes and procedures that show their adherence to labour standards as well as requiring them to adhere to CBUG's standards for further compliance if CBUG deem fit.

We ensure:

- our values, which are embedded throughout our business, set the perimeters for how
- we expect our people to behave with colleagues, clients and our supply chain
- our policies and procedures relating to the Modern Slavery Act are in line with our culture and values.

In addition to the policies and procedures mentioned above CBUG in 2019:

- Introduced a new screening tool within the compliance department to enhance capabilities when conducting due diligence
- Introduced a new training platform to provide training to all CBUG employees enabling training across all departments within CBUG. The training tool also has capabilities to provide training to external business associates if CBUG deem necessary.
- Created a new due diligence process where further Identification and verification checks are carried out.
- Updating current procurement process introducing new forms, supplier questionnaires and enhanced due diligence.

Progress has been made over the past 12 months enhancing our capabilities of ensuring Modern Slavery is tackled across our business and supply chain, but we recognise that the risk is constant. Over the next 12 months CBUG will continue to improve our understanding of those risks by:

- Embedding the modern slavery training through issuing modern slavery training across the business.
- Enhancing our understanding of the shifting risks associated with in modern slavery around the world.
- Launching the new procurement process which will enhance supplier due diligence and mitigate risks of modern slavery within our supply chain further.

The Modern Slavery and Human Trafficking statement has my personal backing and support. Our reputation, integrity and the success of the company depends on each employee acting in accordance with the law and the ethical standard detailed in this statement.



Signed

Chris Droogan | Managing Director Cleveland Bridge UK Limited 28 April 2020