

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement has been published in accordance with the Modern Slavery Act 2015 and sets out the steps BCEGI UK has taken to prevent human trafficking and slavery in our business and supply chain.

BCEGI UK is committed to promoting ethical business practices and policies to protect its workers, and those who work with the Company. We are dedicated to acting transparently by disclosing information about any modern slavery risks we may identify and what actions we will take in response to them – prioritising any risks as they arise and making year-on-year progress to improve our processes.

BCEGI's Directors and Senior Management shall take responsibility for implementing and communicating this Policy Statement and its objectives and shall provide adequate resources (awareness, training, etc.) and investment to ensure that modern slavery and human trafficking is not taking place within the organisation or its supply chains.

A copy of this Policy Statement is available to all employees electronically and can be obtained from the HR department upon request. This Policy Statement will be reviewed annually.

OUR BUSINESS AND SUPPLY CHAINS

BCEGI was founded in the UK in 2013 as part of BCEG's international expansion scheme. BCEG was founded in China in 1953 and is a major Chinese state-owned enterprise, which works in over 27 countries globally. As an internationally diverse business, we draw on a wide range of knowledge and skills from different backgrounds across the globe.

Our strength and depth of cultural, personal and professional understanding means we are well placed to successfully facilitate and deliver bi-lateral trade, particularly between the East and West. BCEGI are key members of the Manchester China Forum, we are proud ambassadors for Manchester and the North West and are proactively operating as a first point of contact for international businesses wishing to invest in the UK and Europe.

Our mission at BCEGI is to exceed expectations in all aspects of our construction, development and investment activities. We aim to be the trusted partner for all our clients and stakeholders.

Our Supply Chain contains a range of companies, from large scale sub-contractors and professional consultants, to small supply only companies used for one off purchases. Our Supply Chain plays a pivotal role in BCEGI's ability to successfully deliver its developments / projects in line with our own and / or our Employers expectations. We are constantly reviewing our Supply Chain members to ensure they continually meet the requirements of BCEGI. This includes a stringent Pre-Qualifications Questionnaire process and ongoing review of our Supply Chain partners.

OUR POLICIES

We have a zero-tolerance approach towards modern slavery and human trafficking, which is implemented into our Policies and behaviours within the workplace and supply chain.

This Policy Statement will be reviewed and updated annually and will be published on our website (with historical versions also available). Our policies are communicated to all employees through our intranet, inductions, training and briefings. We expect our supply chain to follow similar practices to ensure compliance and consistency.

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We continually review our Policies, commercial agreements, consultant appointments and supply of services to reflect our commitment to acting sustainably, ethically and with integrity in all our business relationships. We are also in the process of reviewing and populating our Supplier Code of Conduct to improve our risk management processes.

The following Policies are relevant to Modern Slavery and Human Trafficking:

- Our Modern Slavery and Human Trafficking Policy specifically sets out our zero-tolerance for any activities related to slavery, how we create further awareness and what measures we have in place to prevent this.
- Our Code of Conduct sets out our expectations, such as rejecting anti-bribery and corruption and compliance with the law.

OUR CORE VALUES

Our Core Values are at the heart of everything we do. Our Board of Directors drive them alongside Senior Managers to embed our Core Values, and to create an efficient and positive working environment for our people, supply chains and the communities in which we work.



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DUE DILIGENCE PROCESSES

Within our own business

Wherever possible we directly recruit our employees. We do however utilise the use of agencies where necessary. When sourcing and placing candidates with us, Our Preferred Supplier List must comply with the Act and ensure they have up-to-date Processes in place to manage any risks associated with the Act.

We always verify the Right to Work of all our employees and ensure their salary is paid directly to them.

Supply chain

BCEGI acknowledges its responsibility to the [Modern Slavery Act 2015](#) and will ensure transparency within BCEGI and with suppliers of goods and services to the organisation. These, as well as the suppliers of services, make up the supply chain within the Company.

As part of BCEGI's due diligence processes into modern slavery and human trafficking, the supplier approval process incorporates a review of the controls undertaken by its suppliers.

Imported goods from sources from outside the UK and EU are potentially more at risk for modern slavery and human trafficking issues. The level of management control required for these sources will be continually monitored.

BCEGI will not support or deal with any business knowingly involved in modern slavery or human trafficking.

RISK ASSESSMENT AND MANAGEMENT

We have or are in the process of creating the following:

- Our current suppliers are asked to conform with this Policy Statement and our Supplier Code of Conduct, where non-conformance may result in supplier auditing and/or termination of agreement.
- All employees are made aware of our commitment to combatting modern slavery and human trafficking.
- Training of our Senior Management Team and employees involved in the procurement process.
- Introduction of modern slavery awareness training during company induction and periodically for current relevant employees.
- Internal audit programme to review Policy content and use.
- Evidence of right to work is required before official employment can commence.
- Salary of both new and existing employees can only be paid to a bank account owned and controlled by the employee.

AWARENESS AND TRAINING

We create awareness on modern slavery and human trafficking via updating this Policy Statement annually and ensuring it is available for employees to review via our iMS and for the general public via our website. This is something existing and new employees are encouraged to review upon starting with us and throughout employment.

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Our Whistleblowing Policy encourages employees to report any unethical practices either internally or externally within the business or via our suppliers. Any reports received are taken extremely seriously and are fully investigated.

AUTHORISATION

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Lead Director
1st January 2022

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