



ANTI-SLAVERY POLICY

Burntisland Fabrications Ltd has a zero-tolerance approach to all forms of modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships.

AIMS OF THIS POLICY

This policy explains the BiFab's commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other form of business relationship.

This policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third party representative.

We expect all who have, or seek to have a business relationship with BiFab to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

We will only do business with organisations that fully comply with this policy or those who are taking verifiable steps towards compliance.

This policy will be used to underpin and inform any statement on Slavery and Human Trafficking that we produce further to the transparency in supply chain requirements of section 54 of the Modern Slavery Act 2015.

WHAT DO WE MEAN BY MODERN SLAVERY?

Modern slavery can take many forms. It is a complex and multi-faceted crime. The MSA 2015 covers four key activities:

1. Slavery: ownership is exercised over an individual
2. Servitude: involves the obligation to provide services imposed by coercion
3. Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
4. Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which we will not tolerate, but are not specifically referenced in the MSA 2015 include, but are not limited to:

Child labour: involved the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.



All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships.

HOW WE SEEK TO EMBED OUR ANTI-SLAVERY POLICY IN PRACTICE

To underpin our policy commitments, we are in the process of implementing the following measures over the course of the financial year 2019/2020.

1. Where appropriate, as informed by our risk assessments, we will undertake pre- screening of prospective suppliers as part of our tender processes in relation to the effectiveness of their existing safeguarding controls and practices including, but not limited to those in relation to preventing modern slavery occurring within their organisation and within their own supply chain.
2. Our contractual documentation includes specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour and the use of child labour in line with this policy. We also make provision for our contracted suppliers to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is breach of this policy.

RESPONSIBILITY FOR THIS POLICY

The BiFab Board of Directors has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

The Finance Director will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

COMMUNICATION AND EMPLOYEE AWARENESS TRAINING

The HR Manager will ensure that all relevant staff receive adequate training on this policy and any supporting processes applicable to their role. Such training forms part of the Company's induction processes.

In addition BiFab personnel will receive training on the broader issues of modern slavery so as to assist them in appreciating the extent of the problem of modern slavery and the identify individuals/areas of the business that may be at risk from practices of modern slavery.



BREACHES OF THIS POLICY

Any breaches of this policy will be taken seriously and dealt with on a case by case basis.

The breach of this policy by an employee or director BiFab may lead to disciplinary action being taken. Serious breaches will be regarded as gross misconduct and may lead to immediate dismissal in accordance with our disciplinary procedure.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

We will terminate relationships with suppliers, individuals or any business partners working on our behalf who are considered to be in breach of this policy.

If any part of this policy is unclear, clarification should be sought from HR.

STATUS OF THIS POLICY

The Anti-Slavery policy will be reviewed by the Company's Board of Directors on an annual basis.

This policy does not give contractual rights to BiFab employees. The Company reserves the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.



INTRODUCTION

Burntisland Fabrications Ltd is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

We are committed to ethical principles and require all employees to comply with applicable employment legislation and supply chain management legislation in the countries in which we have commercial operations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year 2019/2020.

OUR ORGANISATIONAL STRUCTURE AND OPERATIONS

Burntisland Fabrications Ltd is a manufacturer of steel structures for a range of clients operating in the renewables, oil and gas industry sectors.

We are a part of the JV Driver Group of Companies, our parent company within the Group, DF Barnes, has its head office in Canada

NATURE OF OUR SUPPLY CHAINS

The nature of our business requires an extensive UK and international supply chain and we regularly source materials from Europe and the Far East. We are fully committed to ensuring transparency in our approach to addressing modern slavery throughout our supply chains network.

Accordingly, we will not deal with any business that is known to be involved in or associated with any form of slavery or human trafficking.

Prior to approving any new supplier, we will review the controls they undertake to eliminate modern slavery and human trafficking, particularly with regard to any goods or materials imported from outside the UK and EU where there may be a potentially greater risk of modern slavery and human trafficking.

Our zero tolerance approach to modern slavery will be clearly communicated to all suppliers, contractors and business partners when we enter into a business relationship with them and re-inforced as required in any subsequent communications with them.



POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING

Our Anti-Slavery and Trafficking policy reflects our commitment to acting ethically and with integrity in all our business activities and relationships and implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations or supply chains.

We also make sure that our suppliers are aware of our policies and adhere to the same high standards.

This policy has been subject to a consultation process with our recognized Trades Unions in conjunction with the BiFab Whistleblowing procedure.

Risk Assessment

We use detailed risk assessment and audit processes to assess which of our own activities and supply chains represent the highest risks in respect of slavery or human trafficking.

We also seek to continually review the operations of existing suppliers in relation to the risk of modern slavery and human trafficking.

DUE DILIGENCE PROCESSES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

In order to monitor and mitigate the risks of slavery and human trafficking occurring within our supply chains we will undertake all the necessary due diligence measures to ensure that any business entities we deal with in whatever capacity, are not engaged in or associated with any modern slavery or human trafficking activities.

STAFF TRAINING

We facilitate training to all key staff to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and effectively operate our policies and procedures aimed at mitigating this risk.

All existing personnel will be informed that BiFab has an agreed statement that can be accessed through the in house Management System. All new starts joining the business will be made aware of the existence of the statement during Induction Training and informed as to how the statement can be accessed in either hard copy or electronic format. In conjunction with this, all personnel will also be made aware of the BiFab Whistleblowing Procedure as the means for highlighting any specific concerns to the company. in relation to Modern slavery issues

BiFab also requires our key suppliers to provide such training to their own staff.

BiFab will make specific provision in our Whistleblowing Policy for the protection of those who whistle-blow in relation to an issue of modern slavery.



FUTURE ACTION

As a result of our assessment, we aim to take the following further steps over the course of the next financial year 2019/2020.

- Review our due diligence processes
- Verify that the businesses in our supply chain network are fully committed to ensuring their own zero tolerance positioning on modern slavery and human trafficking
- Ensure our own audit processes adequately reflect our legal obligations and the content of this policy document.

Signature

Scott Forrest – Finance Director **Date: 29th March 2019**

This statement will be reviewed annually and updated or amended as required.