

**BCM Construction Ltd**

This statement applies to BCM Construction Ltd, part of ENABLE Investment Holdings for the time period 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021.

BCM Construction Ltd (BCM) is an award-winning SME, principal contractor, and leading provider of design, civil and electrical engineering services to clients in the UK transport sector.

We had an annual turnover of approximately £39 million and around 65 employees across our UK sites in the 2020/21 financial year.

Our supply chains are not extensive with most bulk construction materials procured in the UK directly from well-established national suppliers who themselves have issued statements under the Modern Slavery Act.

**Our Modern Slavery Policy**

BCM Construction does not tolerate modern slavery in our business or in our supply chain and we recognise that high levels of integrity are required in our procurement of people, goods and services. We are also committed to ensuring that there is transparency in all our business operations and expect the same approach to be taken by all our suppliers, subcontractors and other business partners.

We have worked closely with recognised experts in the field of modern slavery to create a comprehensive Modern Slavery Policy which we are confident will prevent and minimise modern slavery in our organisation and within our supply chains, this policy is linked to the existing whistleblowing and grievance policies.

**Due Diligence Processes**

BCM Construction acknowledges that the risk of modern slavery is present in the construction sector in the UK, particularly when temporary staff recruited via third party recruitment agencies are involved. To manage this part of our supply chain, we have established close working relationships with a number of national and local recruitment agencies in the UK.

We believe the three keys areas where risks exist and can be mitigated are: payroll, recruitment of temporary manual staff, and procurement of raw materials. Specific actions to prevent or minimise the risk of modern slavery in these areas have been identified and implemented and are detailed in our Modern Slavery Policy.

**Risk Assessment and Management**

A detailed risk assessment audit has been conducted around the key activities of the organisation and current risks mapped and measured. A number of mitigation actions have been identified and will be introduced to further reduce the risks identified, this will be an annual process. A comprehensive modern slavery action plan has been formulated and is being implemented.

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**Key Performance Indicators**

A number of key performance indicators (KPIs) have been identified which will drive the effectiveness of this policy. Progress against the action plan and the KPIs will be reported to the board of BCM Construction by the Chief Operating Officer on a quarterly basis.

- All staff to complete Modern Slavery Online Awareness Training

**Training**

Keys directors and managers of the company have received in-depth training to understand what modern slavery is and how it can affect the business.

Training on this policy, and on the risks that BCM Construction faces from modern slavery in its supply chains, will be provided as part of the induction process. In addition, on-site supervisors and some national/regional/head office roles, will be required to complete training on modern slavery.

**Governance**

This statement has been approved by the ENABLE/BCM Board of Directors for publication on 30/09/2021.

Stuart Jackson  
**Chief Operating Officer**  
September 2021

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