POLICY STATEMENT

MODERN SLAVERY AND HUMAN TRAFFICKING



STATEMENT OF INTENT

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 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

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.

POLICIES

This Policy Statement will be renewed annually, be published on our website (with historical versions also available) and be readily available to our employees.

We continually review our 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.

DUE DILIGENCE PROCESSES

BCEGI acknowledges its responsibility to the <u>Modern Slavery Act 2015</u> 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.

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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.

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

Dongwen Yu

Lead Director 1st January 2019