

## **Bell and Bain Forced Labour, Child Labour & Prison Labour Supplier Responsibilities Statement**

### **1. Purpose**

Bell & Bain Ltd is committed to conducting business ethically, responsibly and in accordance with internationally recognised human rights and labour standards.

Bell & Bain strongly opposes all forms of forced labour, bonded labour, prison labour, child labour, human trafficking and worker exploitation.

This Statement establishes Bell & Bain's expectations regarding ethical labour standards throughout its operations and supply chain and supports the company's:

- Human Rights, Ethical Labour & Worker Protection Policy
- Modern Slavery Statement
- Sustainable Procurement Policy
- Supplier Code of Conduct
- Supplier Approval & Monitoring Procedure
- Corporate Responsibility & Sustainability Statement

Bell & Bain believes that no commercial objective justifies the exploitation of human dignity.

### **2. Scope**

This Statement applies to:

- All Bell & Bain operations
- All employees and contractors
- All suppliers and subcontractors
- All products and services procured or supplied under the Bell & Bain name
- Relevant downstream supply chain activities

Suppliers are expected to communicate these requirements throughout their own supply chains where appropriate.

### **3. Our Commitment**

Bell & Bain is committed to:

- Respecting internationally recognised human rights
- Maintaining fair and ethical labour practices
- Preventing modern slavery and worker exploitation
- Supporting worker welfare and wellbeing
- Promoting responsible sourcing
- Supporting freedom of association and worker representation
- Maintaining lawful and transparent employment practices

The company does not tolerate:

- Forced labour
- Bonded labour
- Debt bondage
- Prison labour where involuntary or exploitative
- Child labour
- Human trafficking
- Coercion, intimidation or abuse of workers

### **4. Ethical Employment Standards**

Bell & Bain employees are free to enter and leave employment voluntarily and in accordance with mutually agreed contractual arrangements and applicable legislation.

Bell & Bain:

- Does not require deposits as a condition of employment
- Does not retain personal identity documents
- Does not tolerate coercion, threats or restrictions on lawful employment movement
- Ensures employment is freely chosen

Employment practices are reviewed through management oversight, internal audits and continual improvement activities.

## 5. Child Labour

Bell & Bain does not employ child labour and complies with all applicable minimum age legislation.

Recruitment processes include appropriate verification of:

- Identity
- Eligibility to work
- Age requirements
- Employment documentation

Bell & Bain does not employ any person below the age of 16.

## 6. Young Workers and Apprenticeships

Bell & Bain actively supports Scotland's apprenticeship and skills development programmes as part of its commitment to workforce development and social responsibility.

Where young workers are employed:

- Employment must be lawful and ethical
- Appropriate safeguarding measures shall be maintained
- Suitable supervision shall be provided
- Training and development opportunities shall be available
- Young Worker Risk Assessments shall be completed for employees under 18 years of age

Bell & Bain is committed to ensuring all young workers are treated with dignity, respect and appropriate protection.

## 7. Prison Labour

Bell & Bain does not knowingly utilise prison labour within its operations.

The company does not engage in:

- Involuntary prison labour
- Coerced rehabilitation programmes
- Any arrangement that restricts worker rights or freedoms

Any future rehabilitation or social employment initiative would only be considered if:

- Participation is voluntary
- Appropriate labour protections are in place
- Human rights are protected
- Applicable legislation is fully complied with

## 8. Supply Chain Responsibilities

Bell & Bain expects suppliers to maintain labour standards that are consistent with internationally recognised human rights principles and ethical labour practices.

Suppliers shall:

- Prohibit forced labour
- Prohibit prison labour where involuntary or exploitative
- Prohibit child labour
- Respect worker rights
- Maintain safe and healthy working conditions
- Comply with applicable labour legislation
- Prevent discrimination and harassment
- Maintain appropriate grievance mechanisms
- Demonstrate ethical recruitment practices

Suppliers should not utilise labour brokers or recruitment agents without appropriate controls and due diligence arrangements.

## 9. Supplier Human Rights and Labour Standards

Bell & Bain expects suppliers to:

- Maintain documented labour and human rights policies
- Prohibit forced labour, prison labour and child labour

- Prohibit discrimination, harassment and abuse
- Respect freedom of association and collective bargaining rights where permitted by law
- Allow workers to raise concerns without retaliation
- Maintain safe and healthy working environments
- Demonstrate compliance through policies, certifications, audit reports or questionnaires

Acceptable evidence may include:

- SMETA audits
- ISO certifications
- SA8000 certification
- Ethical labour assessments
- Sustainability questionnaires
- Other recognised compliance evidence

Suppliers are expected to notify Bell & Bain immediately if any actual or suspected labour rights violation is identified within their operations or supply chain.

## 10. Due Diligence and Monitoring

Bell & Bain maintains a risk-based approach to ethical labour management and supply chain oversight.

Monitoring activities may include:

- Supplier approval processes
- Supplier sustainability questionnaires
- Supplier reviews
- Supplier performance monitoring
- Ethical sourcing assessments
- Modern slavery reviews
- Internal audits
- Risk & Opportunity Reviews

Supplier performance is monitored in accordance with Bell & Bain's Supplier Approval & Monitoring Procedure and Sustainable Procurement arrangements.

## 11. Child Labour Remediation

If a case of child labour is identified within Bell & Bain's supply chain:

- The supplier shall notify Bell & Bain immediately
- The wellbeing and best interests of the child shall be prioritised
- Bell & Bain shall seek a legal, ethical and child-centred resolution
- Orders or payments may be suspended pending investigation
- Appropriate corrective actions shall be agreed and monitored

Bell & Bain recognises that immediate contract termination may not always represent the most responsible outcome where doing so could place affected individuals at greater risk.

## 12. Remediation Procedure for Identified Victims

Where child labour, forced labour, human trafficking or related exploitation is identified, Bell & Bain expects suppliers to implement appropriate remediation measures.

Immediate Response

- Stop the exploitation immediately
- Remove affected individuals from harm
- Secure the individual's safety and welfare
- Engage relevant authorities where necessary

Family and Community Support

- Support safe family reunification where appropriate
- Engage relevant support agencies
- Promote awareness of legal protections

Supplier Accountability

- Cooperate with investigations
- Engage competent authorities
- Implement corrective actions
- Address root causes

- Prevent recurrence

#### Preventative Measures

- Strengthen policies and procedures
- Enhance due diligence activities
- Conduct ongoing risk assessments
- Implement training and awareness programmes

#### Non-Retaliation

No worker, whistleblower or stakeholder shall be subjected to retaliation for reporting, participating in or supporting the identification or remediation of labour rights violations.

### 13. Monitoring and Continual Improvement

Bell & Bain is committed to continually improving its approach to ethical labour standards and responsible sourcing.

Performance may be monitored through:

- Internal audits
- Supplier reviews
- KPI monitoring
- Corrective Action processes
- Management Reviews
- Ethical sourcing assessments
- Risk & Opportunity Management activities

Improvement opportunities shall be incorporated into Bell & Bain's Continual Improvement Action Plan.

### 14. Related Documents

- Human Rights, Ethical Labour & Worker Protection Policy
- Modern Slavery Statement
- Freedom of Association & Worker Representation Statement
- Sustainable Procurement Policy
- Supplier Code of Conduct
- Supplier Approval & Monitoring Procedure
- Whistleblowing Procedure
- Corporate Responsibility & Sustainability Statement

### 15. Supplier Declaration of Compliance

Bell & Bain requires suppliers to formally confirm their alignment with this Statement and their commitment to maintaining ethical labour standards throughout their organisation and supply chain.

Supplier Name: \_\_\_\_\_

Supplier Representative (Printed) \_\_\_\_\_

Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

### 16. Approval and Review

This Statement shall be reviewed annually and updated where necessary to reflect changes in legislation, recognised labour standards, customer expectations and best practice.

Responsibility for oversight of this Statement rests with the Directors of Bell & Bain Ltd.

**Approved: Stephen Docherty**  
*Chairman*

**Date of Last Review and Revised: 21.04.2026**

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