

Bell & Bain Modern Slavery Statement

1. Introduction

This statement is made by Bell & Bain Ltd in accordance with the requirements of the UK Modern Slavery Act 2015. It outlines the steps the company has taken to prevent modern slavery and human trafficking within its operations and supply chains.

Bell & Bain Ltd is committed to conducting business ethically and responsibly, ensuring that all workers are treated with dignity and respect.

2. Organisation Structure and Operations

Bell & Bain Ltd operates within the printing and publishing sector, providing printing and related services. The company works with a range of suppliers, service providers, and contractors across the UK and internationally.

3. Commitment to Preventing Modern Slavery

Bell & Bain Ltd has zero tolerance for modern slavery in any form, including:

- Forced or compulsory labour.
- Child labour.
- Prison labour where it is coercive or non-compliant.
- Human trafficking and exploitation.

This commitment is supported through the companies:

- Child Labour Policy.
- Forced Labour Policy.
- Prison Labour Policy.
- Ethical Trading Policy.

4. Policies and Controls

Bell & Bain Ltd maintains policies and procedures designed to prevent modern slavery, including:

- Ethical Trading Policy.
- Freedom of Association Policy.
- Whistleblowing Procedure.
- Grievance Policy.
- Supplier and contractor controls.

These policies ensure:

- Fair treatment of workers.
- Safe working conditions.
- Freedom from coercion and exploitation.

5. Supply Chain Management

Bell & Bain Ltd recognises that risks of modern slavery may exist within supply chains.

To mitigate these risks, the company:

- Works with reputable suppliers.
- Expects suppliers to comply with ethical trading standards.
- May request evidence of compliance where appropriate.
- Reserves the right to review or audit suppliers.

Suppliers are expected to:

- Prohibit forced, child, or exploitative labour.
- Comply with legal and ethical requirements.
- Support responsible and transparent business practices.

6. Risk Assessment

The company considers modern slavery risk based on:

- Type of supplier or service.
- Geographic location.
- Nature of materials or labour involved.

Higher-risk areas may be subject to:

- Increased monitoring.
- Additional verification.

7. Training and Awareness

Bell & Bain Ltd will:

- Raise awareness of modern slavery risks.
- Provide relevant training where appropriate.
- Ensure employees understand how to report concerns.

8. Reporting Concerns

Employees and stakeholders are encouraged to report any concerns related to modern slavery through:

- Line management.
- Grievance procedures.
- Whistleblowing procedure.

All concerns will be treated seriously and without retaliation.

9. Monitoring and Continuous Improvement

Bell & Bain Ltd is committed to:

- Reviewing its policies regularly.
- Monitoring supply chain practices.
- Improving controls where required.
- Responding to any identified risks.

Approved: Stephen Docherty

Chairman

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Appendix A

Monitoring, Measurement and Due Diligence

Purpose

Bell & Bain Ltd monitors modern slavery risks to identify, prevent and mitigate the risk of modern slavery, human trafficking, forced labour, bonded labour, prison labour and child labour within its operations and supply chains.

Monitoring activities support compliance with:

- UK Modern Slavery Act 2015.
- SMETA Ethical Trade requirements.
- EcoVadis Labour and Human Rights requirements.

- FSC Core Labour Requirements.
- Bell & Bain Human Rights, Ethical Labour and Worker Protection Policy.

Compliance Monitoring

Internal Employment Practices

Bell & Bain will monitor:

- Recruitment practices.
- Right-to-work verification checks.
- Ethical recruitment controls.
- Worker-paid fee compliance.
- Employment contracts and terms and conditions.
- Working hours and wage compliance.
- Young worker controls.
- Grievance and whistleblowing reports.

Frequency: Ongoing and reviewed periodically.

Supply Chain Due Diligence

Bell & Bain will monitor:

- Supplier approval processes.
- Supplier Code of Conduct compliance.
- Supplier declarations.
- Supplier ethical performance.
- High-risk suppliers.
- Supplier corrective actions.
- Labour-related concerns within the supply chain.

Frequency: During supplier onboarding and periodic supplier reviews.

Risk Assessment

Bell & Bain will assess modern slavery risk based on:

- Supplier type.
- Geographic location.
- Industry sector.
- Labour intensity.
- Use of subcontractors or agency labour.
- Previous compliance history.

Higher-risk areas may be subject to enhanced due diligence and increased monitoring.

Training and Awareness

Bell & Bain will monitor:

- Modern slavery awareness training completion.
- Induction training completion.
- Manager awareness training.
- Ethical recruitment awareness.
- Communication and awareness activities.

Frequency: Annually and as required.

Reporting Mechanisms

Bell & Bain will monitor:

- Whistleblowing reports.

- Grievances.
- Worker concerns.
- Employee feedback.
- Supplier concerns and reports.
- Corrective action outcomes.

Frequency: Ongoing.

Key Performance Indicators (KPIs)

Bell & Bain may monitor:

Modern Slavery Prevention

- Number of modern slavery concerns reported.
- Number of labour rights concerns raised.
- Number of identified modern slavery risks.
- Number of substantiated cases identified.

Recruitment and Employment

- Ethical recruitment compliance reviews completed.
- Right-to-work checks completed.
- Number of recruitment-related concerns.
- Worker-paid fee incidents identified.

Supply Chain

- Supplier assessments completed.
- Supplier declarations received.
- High-risk suppliers reviewed.
- Supplier corrective actions completed.
- Supplier audits completed.

Training and Awareness

- Modern slavery training completion rates.
- Manager training completion rates.
- New starter induction completion rates.

Continuous Improvement

- Audit findings raised.
- Corrective actions completed.
- Recurring risks identified.
- Improvement actions implemented.

Incident and Remediation Management

Where modern slavery risks or incidents are identified, Bell & Bain will:

- Record the concern.
- Investigate promptly.
- Assess actual and potential impacts.
- Protect affected individuals.
- Implement immediate safeguarding measures where required.
- Develop corrective action plans.
- Monitor actions to completion.
- Verify effectiveness of remediation measures.
- Escalate matters to relevant authorities where appropriate.

Bell & Bain will adopt a victim-centred approach to remediation wherever reasonably practicable.

Records

Bell & Bain may maintain records including:

- Supplier assessments.
- Supplier declarations.
- Modern slavery due diligence records.
- Training records.
- Recruitment records.
- Right-to-work checks.
- Grievance records.
- Whistleblowing reports.
- Corrective action logs.
- Audit findings.
- Risk assessments.
- Management review records.

Records will be maintained in accordance with company document control and data protection requirements.

Management Review

Senior Management will periodically review:

- Modern slavery risks.
- Supply chain due diligence outcomes.
- Supplier compliance performance.
- Training effectiveness.
- Reported concerns.
- Corrective actions.
- Emerging risks and legal developments.
- Opportunities for continual improvement.

Review findings will be used to strengthen Bell & Bain's approach to modern slavery prevention and ethical supply chain management.

Approved: Stephen Docherty

Chairman

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