

# SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 ('the Act') and constitutes our slavery and human trafficking statement for the financial year ended 30<sup>th</sup> June 2018. This statement was reviewed last on the 05/03/2019. This statement will undergo a further review by the 31/12/2019.

We are alert to the risks that slavery and human trafficking pose to both us and our suppliers. We are confident that our approach which is set out below, will prevent slavery and human trafficking within our company and supply chain.

## Our Business

BHL (UK) Holdings Limited, established in 2013 is a holding company for a number of UK subsidiaries including Minster Law Limited and BGL (Holdings) Limited. Our subsidiaries publish their own statements and for Minster Law Limited and BGL (Holdings) Limited these can be found on their websites at [www.bglgroup.co.uk](http://www.bglgroup.co.uk) and [www.minsterlaw.co.uk](http://www.minsterlaw.co.uk).

## Policies on Modern Slavery

We have incorporated our responsibilities in relation to slavery and human trafficking as set out in the Act, within our company policies and reflect our zero tolerance approach to slavery and human trafficking within our company and the suppliers we use.

Our policies are reviewed annually by our Board to ensure that they remain up to date.

## Due Diligence Process

Our employees are from within the UK and all are paid at least the UK National Living Wage.

Our contractual process requests all suppliers to confirm whether they are aware of their obligations to prevent modern slavery in their organisation and supply chain, in line with the Act. Our process also requests that suppliers provide further details in relation to this where relevant. Furthermore, suppliers are requested to make us aware of any breaches of the Act.

## Risk Assessment

Risk assessments are undertaken to ensure we identify any high risk areas within the business and our supply chain. Any adverse findings shall be promptly and robustly addressed.

Risks within the business are assessed using internal metrics. When assessing our suppliers, the type of supplier, the geographical location of the supplier and any internal procedures used by the supplier to prevent slavery and human trafficking are all taken into consideration.

## Measuring Effectiveness

We monitor the effectiveness of our procedures by:

- Conducting an annual review of our policies to ensure they remain current
- Continually monitor any relevant developments/best practise material
- Considering the responses from our suppliers and identify any areas for improvement

## Training for staff

Training for our employees is an important element in ensuring that our zero tolerance approach to slavery and human trafficking is communicated to all employees.

Slavery and human trafficking training is included in our new employee induction material.

A communication to all employees is delivered upon each review of this statement to raise further awareness and ensure that our employees are at least annually made aware of the requirements in relation to slavery and human trafficking.

This statement was approved by the Board on 28<sup>th</sup> February 2019. A signed copy of this statement can be made available on request.



**Ian Leech**  
**Chief Financial Officer**