

BRISTOW & SUTOR GROUP

Modern Slavery Statement (2023/2024)

Policy Owner:	Chief Operating Officer
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Document Details

Version	Status	Date	Author	Details of change
1.0	First Draft	01/05/23	Group HR Director	Draft of Annual Statement (2023/2024)

1. Statement Commitment

Bristow and Sutor Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. It understands that this requires an ongoing review of internal practices in relation to both its workforce and its supply chains.

Bristow and Sutor Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Bristow and Sutor Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. It strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation.

2. Scope

This Statement applies to Bristow and Sutor and Group and all associated companies, suppliers and partners. The information included in the Statement refers to the financial year April 2023/March 2024.

3. Definitions

Bristow and Sutor Group considers that modern slavery encompasses the following:

- Human trafficking
- Forced work, through mental or physical threat.
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse.
- Being dehumanised, treated as a commodity or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

4. Exposure and Actions

Bristow and Sutor Group wholeheartedly supports the principles of anti-modern slavery.

4.1 Potential Exposure

In order to fulfil its activities, Bristow and Sutor Group's main supply chains include those who supply goods, services and people in the United Kingdom. It therefore considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in our business nor the business of any organisation that supplies us with goods and/or services.

4.2 Steps Taken

Bristow and Sutor Groups carries out due diligence processes to ensuring slavery and/or human trafficking does not take place in either its business or supply chains, which includes reviewing the controls of our suppliers.

Bristow and Sutor Group has not, to its knowledge, conducted business with an organisation that has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Bristow and Sutor Group has taken the following steps to ensure that modern slavery is not taking place:

- Reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.
- Establishing and improving measures by which to identify and assess the potential risks in its supply chains.
- Undertaking risk assessments of its services and the potential exposure to modern slavery.
- Creating action plans to address any identified risk.
- Taking proactive steps to embed a zero-tolerance policy towards modern slavery.
- Ensuring all colleagues are familiar with modern slavery principles and are familiar with the Group’s zero-tolerance policy.

5. Responsibilities

All colleagues at Bristow and Sutor Group are responsible for ensuring this Statement is adhered to in the following way:

- Seek to understand this Statement, adhere to the principles and ensure that they do not, by their actions, behaviours or attitudes, directly or indirectly, breach it.
- Assist Bristow and Sutor Group to meet its anti-modern slavery commitment by being aware, vigilant and adhering to Group Policies and Procedures.
- Report any concerns, suspicions or breaches of this Statement to a line manager or the HR team.
- Always behave in a way that respects and reflects Bristow and Sutor Group’s values.

More specific responsibilities are set out below:

Role	Responsibility
The Board	The Board has ultimate accountability for ensuring that this Statement is in place, implemented, monitored and adhered to. The Board has delegated responsibility for this to the Group HR Director and HR Team.
Management	All managers are responsible for promoting and role modelling the principles of this Statement and for ensuring all colleagues adhere to it. Any breaches that they become aware of should be immediately escalated to the HR team.
HR	The HR team has delegated authority to ensure this Statement is implemented, understood and adhered to. Any concerns, suspicions or breaches should be identified and managed via the appropriate channels in a timely way.
Our People	All colleagues are responsible for understanding, promoting and adhering to the principles of this Statement. Any concerns, suspicions or breaches amongst colleagues, suppliers, clients or customers should be notified immediately to their line manager or the HR team.

6. How will this Statement be Monitored?

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each financial year.

The Board delegates responsibility for monitoring adherence to the Group Chief Operating Officer and HR team. Any serious breaches will be flagged to the Chief Executive Officer.

Any individual who believes that an act in breach of this statement has taken place should raise the issue as soon as possible with a member of the HR team.