Blackrow Group Ltd

Modern Slavery & Illegal Workers Policy

Approved by: Tony Booker

Job Role: Managing Director

Signed:

12/9/2025

This policy must be reviewed by the following Date: 10/09/2026

Company Name	Signed by	Review due date
Blackrow group ltd	Tony Booker	10/09/2026

Modern slavery statement

The Modern Slavery Statement was supported and approved by Blackrow Board on 12/09/2025

Modern Slavery is defined as the recruitment, movement, harbouring or receiving of children, women, or men using force, coercion, and abuse of vulnerability, deception or other means for the purpose of exploitation.

It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after. Section 54 of the Modern Slavery Act 2015 places a requirement on all “commercial organisations” with a turn-over in excess of £36 million per annum, to publish an annual Slavery and Human Trafficking Statement to confirm what they have done in the year to address the risks to human rights in their supply chains.

This statement confirms Blackrow’s actions to ensure there is no slavery or human trafficking in its own business and / or its supply chains.

As an organisation, Blackrow is responsible for the supply of high end engineering services across the UK, Europe or further afield. This includes; Food handling systems, Fabrication services, Engineering project Management and design, Mechanical engineering, Electrical engineering, Laser cutting, all within the food industry, petrochemical engineering arena, pharmaceutical industry, renewables,, power generation and utilities and defence.

Blackrow is committed to preventing and acting against identified slavery and human trafficking in its corporate activities, its supply chains, and the wider community.

This statement covers the activities undertaken by Blackrow to ensure that these are free from slavery and human trafficking.

Policies

Blackrow reviews its policies and procedures on an ongoing basis to ensure that they remain compliant and fit for purpose. The following policies and procedures are considered key in ensuring that the organisation meets the requirements of the Modern Slavery Act 2015:

(this is tracked, with oversight from Blackrow leads and the ISO lead)

The HR manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Safeguarding

Blackrow understands its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and adults at risk. Safeguarding processes are in place and training is available and scheduled for employees across the business.

Blackrow does not work in isolation in respect of safeguarding and is committed to engaging with multi-agency partnerships to protect and safeguard all vulnerable people.

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Recruitment and selection

The recruitment policy and processes for Blackrow are transparent, support managers with undertaking a professional recruitment process to get the best candidate for the job. It includes robust procedures for pre-employment checks for employees and casual workers, including:

- right to work checks for new starters and internal movers
- identity checks for new starters,
- relevant qualifications and membership checks
- references

DBS checks where relevant to job (including Certificates of Good Conduct for people who have lived overseas).

Checks are made to ensure we correctly carry out checks on acceptable documents before a person starts working by following the 3 step process as highlighted within national guidance.

Bank process for new starters

The relevant checks ensures that employees and casual workers are paid directly into an appropriate personal bank account.

Employment policies and practices

There are clear and rigorous HR policies and procedures in place and clear management guidance so employees and casual workers are managed effectively. We monitor and update our policies and processes and make positive improvements to our practice and delivery. Blackrow is signposted to forums to engage with the appropriate organisations and staff associations to develop policies and highlight any issues of concern.

The Blackrow has procedures and policies in place on all major employment issues including attendance management, performance management, disciplinary, grievance, dignity at work, whistleblowing, and so on. Standards of expected behaviour are set out in the Codes of Conduct.

There are other policies focused on equalities, and support for employees throughout the employee lifecycle. Blackrow has an Employee Assistance Service that provides a confidential helpline, and access to a range of support.

All the employment policies and guidance are available in the employee handbook. All staff must ensure they read, understand and comply with the policy. All staff are required to enhance the prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Staff are required to;

- Notify your manager OR the HR manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

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- If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the HR manager as soon as possible.
- If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or HR manager
- We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Agency workers

Blackrow has engaged and formed partnerships with agencies to source and supply agency workers. This is to ensure that Blackrow use only reputable employment agencies to source labour. The Agency undertakes the same level of pre-employment checks on agency workers as would be the expected standard of Blackrow.

Pay, grading, and other pay arrangements

To ensure that all employees are paid fairly and equitably, Blackrow has a robust review policy with the Board and oversight for senior leaders. Blackrow has a job evaluation scheme to evaluate new and significantly changed jobs.

Code of Conduct

New starters receive a document with their written statement that outlines key terms and conditions, key employment policies, and makes reference to the importance of the Code of Conduct, This is all contained within the employee handbook.

Code of Conduct makes clear the actions and behaviours expected of them when representing Blackrow.

We strive to maintain the highest standards of employee conduct and ethical behaviour and any breaches are investigated fully. This code also applies to contractors, agency staff, volunteers and those on apprenticeships.

Procurement contractors and service providers

Blackrow purchases works, goods and services from a wide range of suppliers and across a number of categories and is committed to acquiring these in a responsible manner. Blackrow will continue to work with sector colleagues and others to share best practice and keep up to date on slavery and human trafficking considerations within the supply chain.

Blackrow will require the same high standards from all contractors, suppliers and other business partners and as part of the contracting process include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

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Blackrow has reviewed its procurement documentation and processes to align them with the Modern Slavery Act 2015 and will continue to ensure that they keep pace with developments in this area.

Blackrow is committed to ensuring that its contractors adhere to using the highest standards of ethics. All tender processes undertaken require the bidders to provide confirmation that they are fully compliant with the Modern Slavery Act 2015.

Equality and diversity

Blackrow is committed to making equality an integral part of its daily business and as a major employer, service provider and commissioner we are committed to advancing equality of opportunity and providing fair access and treatment in employment opportunities and when delivering services to those in the community. We will seek to embed equality and diversity into our everyday business.

We expect all representatives of Blackrow, to treat everyone fairly, with dignity and respect.

Illegal Workers

Blackrow Group Ltd carry out appropriate VISA, Passport and DOB checks to ensure all employees are entitled to work in the UK in accordance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006. Should a non-EU resident apply to work with us, as identified by pre-employment screening questions, a copy of their work visa and passport would be required. All necessary checks would then be made to ensure the person had the right to work in the UK and they have no immigration restrictions that prevent them from doing the work in question.

Should a potential employees' right to work in the UK be on a temporary basis, additional checks will be carried out to ensure that their documents have been renewed prior to them commencing employment to prevent a situation where their working rights would expire during their period of employment.

Blackrow are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from UK Visas and Immigration.

All related verified documentation is retained for a minimum of 2 years after the individual has ceased employment with Blackrow Group Ltd.

Training and awareness

Blackrow has an induction programme which includes mandatory safeguarding training which all employees must complete. Blackrow will seek to continue to develop its training offer to improve its staff's ability to identify and report modern slavery and human trafficking.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

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Enhanced training and awareness will be provided to those in key positions across the business to provide additional oversight and resilience. Those roles include HR, Procurement, those in managerial positions and staff engaged with contracts.

Performance indicators

The effectiveness of the steps taken by Blackrow to ensure that modern slavery and / or human trafficking is not taking place within our business or supply chains, will be measured through the following methods:

Thorough investigation of all allegations, complaints, Whistleblowing reports and safeguarding referrals received from employees, members of the general public or law enforcement agencies regarding Modern Slavery and Human Trafficking. Blackrow will ensure that any learning from these is acted upon and shared appropriately.

Reviewing and evaluating high risk supply chains and contracted services as part of ongoing contract management / monitoring activity.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Working with suppliers and due diligence

The makeup and nature of our global supply chains for goods and services is increasingly complex. Modern Slavery and human trafficking can be present within any community and whilst slavery can be found anywhere in the chain, it tends to be much worse further down the value chain where there is little visibility and where the poorest and most vulnerable work.

Blackrow will continue to work to ensure that all vulnerable people are safeguarded and recognises the high-risk groups in its community including workers with certain occupations.

Blackrow will continue to adhere to Section 52 of the Modern Slavery Act which places a duty to notify on the local authority. Any incidents of Modern Slavery will be referred to the Police and other appropriate governing boards such as the Community Safety Board.

Review and approval

This statement has been submitted to Directors for approval and will be reviewed yearly.

All staff hold a responsibility to identify, and report concerns through the identified channels.

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