

# Modern Slavery Act Statement

## Modern Slavery: Where We Stand



At British Cables Company (BCC) we are committed to running our business responsibly. We strive to maintain high ethical principles and to respect human rights. It also means doing our best to encourage high standards in our supply chain and business.

In this document we describe our business and supply chain, and how we operate them. We explain our current policies and practices, and the plans that we have to enhance these in light of the Modern Slavery Act.

### Our business and supply chain

British Cables Company is a member of the Wilms Group. We make cables and accessories for a number of key market sectors including telecommunications, infrastructure, buildings, industrial and rail.

Our cable manufacturing base in Manchester is steeped in history with the factory having been operational for more than 125 years. This longevity brings invaluable experience and expertise which has seen the operation evolve to what it is today: a world class, industry respected cable manufacturer. We support and supply a global client base from our commercial operations in the UK, Continental Europe and Middle East.

As of 30<sup>th</sup> July 2021 we employed 119 people.

Around 175 suppliers sell to BCC. On top of that, lots of those suppliers have their own Suppliers. The BCC supply chain is therefore very large and complex. So BCC prioritises attention on companies that supply high value products or services, or things without which our business couldn't run.

### Our stance on modern slavery

We don't use or accept forced, bonded or involuntary prison labour or child labour. Nor do we demand deposits or hold onto our workers' identity papers, or work with businesses that do. We only work with people who choose to work freely. We respect the right to equal opportunity and freedom of association.

BCC takes an even firmer approach with those companies whose products or services we couldn't do without - or those with whom we have longstanding contracts. Here it also uses its Sourcing with Human Dignity standard, establishing the principle that working conditions in its supply chain should meet international labour standards.

Sourcing with Human Dignity covers freely chosen employment, freedom of association, working conditions, child labour, living wages, working hours, discrimination, regular employment and harsh or inhumane treatment BCC is strengthening sections of it to include more explicit references to forced or bonded labour and human trafficking.

We welcome our people speaking up about any unethical behaviour, and BCC makes it easy for them to do so via their manager.





## How we check compliance with our standards

We aim to prevent modern slavery or human trafficking in our business right at the start of our recruitment processes. We don't charge fees to people joining BCC Cables and we wouldn't expect our external agents to either.

Once people join us, they're expected to live up to our principles. We give our people plenty of support, education and training. But if they don't behave ethically at work we would consider taking disciplinary action against them, which ultimately could lead to dismissal.

Since the Modern Slavery Act came in, BCC has decided to look deeper into the company's business operations, including recruitment, to identify any parts at risk of slavery and human trafficking. As we keep learning more, we'll review and refine the steps we take to identify potential incidences of slavery or human trafficking.

The steps BCC takes for our supply chain depend on how we initially evaluate a supplier. It asks all but our lowest risk suppliers to complete its 'Sourcing with Human Dignity' questionnaire - which helps establish a high, medium or low risk of them falling below our standards.

Risk profiling helps BCC focus its efforts where they are most needed. For example, suppliers may present a higher risk of slavery or human trafficking because of where they're based or the type of product or service they provide. All medium risk suppliers get a review. High risk suppliers get a more detailed review to better understand the risk and put in steps to tackle it; this may mean visiting their sites.

Each year BCC does on-site audits of the higher risk suppliers. We work together with them to address any problems we pick up.

We keep our processes under review, as well as looking again at the supply chain approach in light of the Modern Slavery Act.

## Helping British Cables Company people learn about the issues

Everyone who works for BCC has to read and sign The BCC Way policy statement when they start. All senior and first line managers must refresh their knowledge on The BCC Way every year in order to keep up with amendments to the policy.

The policy includes a human rights clause which will be updated to more specifically address modern slavery and human trafficking. This will help our people understand and identify slavery and human trafficking risks, and remind them how they can report any concerns

All our buyers have to complete Corporate Social Responsibility and Sustainability Awareness training this includes learning about the Sourcing with Human Dignity code.



### Measuring how we're doing

We check how we're measuring up against our business standards - including The BCC Way in a number of ways.



We'll work within BCC to develop a more comprehensive programme addressing the risks of slavery and human trafficking beyond our direct suppliers. Longer term, we'll look at developing better ways of measuring the effectiveness of the steps we take to manage these risks and we'll be able to talk more about how we've progressed in next year's statement.

This statement covers 1<sup>st</sup> August 2021 to 31<sup>st</sup> July 2022 and has been approved by the board of BCC



Kevin Samuel – Managing Director

1<sup>st</sup> August 2021

