

Modern Slavery Policy

Policy and Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Bar2 has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Bar2 has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business

Bar2 is a Payroll, Tax & Compliance company, we take control of the tax and compliance side of contractor engagement and payroll to ensure that contractors are paid correctly, legitimately and on time.

Our High Risk Areas

The supply of a payroll solution to our clients to ensure all payments comply with HMRC, tax and employment legislation. Identification and right to work checks: Bar2 rely on site personnel to examine the original documents of individuals that require a right to work status check and make judgement before copies are sent to us for further checking.

We have an internal checking procedure that is escalated through to management who liaise with the home office to whom we refer any fraudulent or potentially fraudulent documents. This will allow for eligibility to work in the UK checks for all contractors and employees to safeguard against human trafficking or individuals being forced to work against their will.

Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our Suppliers

Bar2 operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all clients before allowing them to register with our company. This due diligence includes an online search to ensure that they have never been convicted of offenses relating



to modern slavery. Our anti-slavery policy forms part of our contract with all clients and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. We may terminate the contract at any time should any instances of modern slavery come to light

Training

We regularly conduct training for our staff so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

J. Lowery

Joss Lowery
Managing Director
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