



Modern Slavery Statement

Scope

Modern Slavery Statement – Year Ending 31 December 2025

This statement is published in accordance with Section 54 of the UK Modern Slavery Act (2015). It outlines the actions taken by BEAR Scotland Limited (BEAR) to prevent modern slavery and human trafficking within our operations and supply chain.

BEAR is a leading highways service provider working in partnership with the Scottish Government (Transport Scotland), with an annual turnover of approximately £190 million. We currently operate across the 'North/West' and 'South/East' Trunk Road Units and manage the M80 and A92 DBFO contracts. We manage approximately 1,914km of roads and 2,371 structures, operating 24/7, 365 days a year.

Our commitment to ethical business practices is central to our values and guides our efforts to address and form the foundation of our commitment to tackling modern day slavery risks within our Supply Chain. We continue to promote and embed our Modern Slavery and Human Trafficking principles across our workforce and supply chain. Our Modern Slavery Statement is included in our onboarding checklist, accessible via our internal Intranet Portal (BEARnet), published on our website and embedded in our daily responsibilities as part of being a responsible employer.

Our supply chain includes a wide range of specialist sub-contractors, accounting for around 60% of our turnover. Additional services are delivered by in-house teams, with materials sourced from trusted external suppliers and manufacturers.

Each year, we engage with around 100 sub-contractors across Scotland, whose performance and adherence to Ethical Trading Standards are essential to our success. Our supply chain strategy prioritises long-term partnerships with a select group of high-performing suppliers, built on shared commitments to safety, quality, and ethical practices.

Policies

Our policies and guidance clearly define how we operate as a business and the measures we take to remain transparent, accessible, and inclusive. They reflect our ongoing commitment to ethical conduct and the prevention of modern slavery in all aspects of our work.

These documents are reviewed regularly and updated to ensure that ongoing opportunities for improvement are identified and acted upon. They are available for viewing by all BEAR personnel via our intranet, BEARnet and include:

- Equality and Diversity Policy
- Equal Opportunities
- Dignity at work
- Pay & Benefits
- Anti-Bribery & Corruption
- Employee Volunteering Policy
- Community Volunteer Days (CSR)
- Whistleblowing Policy / Safecall
- Recruitment and Selection
- Code of Conduct and Ethics
- Ethical Trading or Human Rights
- Community Benefits
- Modern Slavery Policy

All our employees are expected to read and comply with these policies, recognising that the prevention and reporting of modern slavery is a shared responsibility across BEAR.

This applies to everyone working directly for the company or under its control and reflects our commitment to upholding ethical standards throughout our operations and supply chain.

Compliance

BEAR recognises the construction sector's vulnerability to modern slavery risk due to its labour-intensive nature, tight margins, and multi-tiered subcontracting. We are committed to enforcing robust policies and educating both direct and subcontracted workforces.

We employ a dedicated Recruitment and Employee Experience Specialist to safeguard and ensure recruitment and selection compliance, our HR team manage all right-to-work and pre-employment checks, including verification of personal ID and bank account ownership. Any discrepancies are thoroughly investigated and addressed. We have highly qualified personnel across the business which ensures we have experience that delivers.

experience that delivers



All sub-contractors and suppliers working for us must pre-qualify to be approved. Specific questions relating to modern slavery, equality, diversity and inclusion, social values and the Bribery Act must be satisfactorily addressed. This approach is taken for all sub-contractors and suppliers prior to commencing any works.

Our whistleblowing policy applies to all employees of BEAR. Other individuals performing functions in relation to the organisation, such as agency workers and contractors, are also encouraged to use it. This allows safe reporting by any individual of any wrongdoing, including human rights abuses either being directly experienced or witnessed. Individuals are encouraged to raise such concerns with their line managers but are free to contact Safecall, a third-party whistleblowing helpline, should they prefer.

In 2025 as a business, we committed to and achieved the following:

- **Enhancements to onboarding process** - we invested in technology to strengthen pre-employment and right to work checks. The ability to work illegally is a driver of illegal migration. It leaves people vulnerable to exploitation. Our process ensures this does not happen in BEAR.
- **Training and guidance for new starts and the recruitment process** – we now employ a permanent Recruitment and Employee Experience Specialist.
- **Produce enhancements to our Supply Chain Policy** - continued review and share of updates

Targets for 2026

Training & Education

- Deliver *Stronger Together* – ‘Tackling Modern Slavery’ training to HR and Recruitment.
- Integrate modern slavery awareness into onboarding through a video resource featuring real-life examples from the construction sector.

Responsible Recruitment

- Implement a Responsible Recruitment Policy and toolkit across all recruitment processes to ensure ethical hiring practices.

Awareness & Engagement

- Actively promote Anti-Slavery Day (18 October) through internal communications with engagement team.

Policy & Process Enhancement

- Continue to review and update the Modern Slavery and Human Trafficking Policy annually, incorporating feedback from employees and supply chain partners.

Supply Chain Accountability

- Require all sub-contractors to confirm compliance with Ethical Trading Standards and provide evidence of their own anti-slavery policies.

Signed: 

Iain Murray, Managing Director
Date: