

**Baird & Co. Ltd**



Baird & Co.  
Bullion Merchants  
Est. London 1967

**Modern Slavery and Human Trafficking  
Statement 2025**

## **SECTION 1: Organisational Structure, Business and Supply Chains**

Baird & Co. Ltd (Baird & Co.) is a Private Limited Company registered in England & Wales under company registration number 02269558. The company specialises in commercial services, including the refining of precious metals, sales and trading of precious metals, scrap buying, and the production of manufacturing materials and engineering products. With an international client base, Baird & Co. provides products globally to approved regions.

Baird & Co. Ltd are fully committed to compliance with the UK Modern Slavery Act 2015, acknowledging slavery, servitude, forced or compulsory labour, and human trafficking offenses.

Baird & Co. are committed to being a responsible supplier and do not tolerate any form of slavery, servitude, human trafficking, or forced labour within our business or supply chains. Baird & Co. are committed to detecting and preventing modern slavery and human trafficking within all our business operations and activities and the Company is committed to ensuring that our supply chains are free from any forms of slavery and human trafficking

In the past year, there have been no reports of any instances of modern slavery detected within the Company's business or supply chains.

Baird & Co. are committed to dealing fairly with all suppliers, upholding fair competition and developing lasting business relationships.

Baird & Co. have implemented effective management systems and controls which ensure that the Company has processes in place that:

- do not support fraud, corruption nor any other illegal activities
- maintain high moral and ethical business standards
- cultivate proper business relationships with all customers and counterparties

## **SECTION 2: Policies relating to Modern Slavery and Human Trafficking**

Baird & Co. Ltd have effective policies, procedures and controls designed to ensure the Company is compliant with the industry standards set forth in the following publications:

- The LBMA Responsible Gold Guidance (version 9) (2021)
- The LBMA Responsible Silver Guidance (2018)
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition (2016)
- The UK Bribery Act (2010)
- The OECD Convention on Combating Bribery of Foreign Public Officials in International

- Business Transactions (1997) (2009) (2021)
- The International Labour Organization (ILO) standards, on Child Labour; Minimum Age convention (1973), Worst Forms of Child Labour Convention (1999)
- The EITI (Extractive Industries Transparency Initiative) Principles (2003 and 2023 amendment)
- The Responsible Jewellery Council Code of Practices (2019)

Supporting policies, such as Anti-Money Laundering, Customer Due Diligence, and Anti-Bribery and Corruption, contribute to a comprehensive compliance framework. The policies are held in a shared drive and are available to all staff for referral at all times.

Our policies are reviewed annually, or sooner if regulatory requirements necessitate. We ensure that all policies reflect the requirements of the regulator and, that they provide appropriate controls related to our business.

### **SECTION 3: Specific Risks of Modern Slavery within the Precious Metals Industry**

Baird & Co. recognise the particular risks relating to the prevalence of modern slavery offences that have been identified within the international precious metals supply chain.

Baird & Co. train staff\* on the International Labour Standards relevant specifically to the global precious metals supply chain, as detailed within the following publications:

- ILO Baseline Survey on Child and Adult Works in Informal Gold and Fluorspar Mining (2006).
- Ending child labour, forced labour and human trafficking in global supply chains 2019.
- Gap analysis and recommendations on laws on child labour and working conditions in artisanal small-scale gold mining (2019).
- Measuring child labour, forced labour and human trafficking in global supply chains: A global Input-Output approach 2019.
- ILO Artisanal and small-scale gold mining baseline report: Camarines Norte and South Cotabato (2020).

\*The training and information dissemination is repeated annually on a refresher basis.

Baird & Co. require all suppliers and counterparties to comply with local and international laws on modern slavery and human trafficking. Additional checks and verifications are completed for customers in known high risk regions.

#### **SECTION 4: Due diligence processes in relation to slavery and human trafficking in the Company's business and supply chains**

Baird & Co. undertake a due diligence process on all customers, suppliers and trading counterparties which includes an analysis of AML risks, geographical and industrial risks as well as incorporating responsible sourcing protocols.

Suppliers are screened against the current CAHRAs list (Conflict-Affected and High-Risk Areas) (under regulation (EU) 2017/821) for any exposure a supply chain may have to these regions.

**Baird & Co. have specific Supply Chain Due Diligence statements and policies which are updated annually. Furthermore, the Company's processes and procedures in relation to Supply Chain Due Diligence are independently audited each year.**

#### **SECTION 5: Training**

Baird & Co. conducts training with relevant staff on applicable ILO Labour Standards and ETI Indications of Forced Labour. This enables employees to identify any potential instance of slavery and human trafficking within an existing or prospective supplier.

All employees are trained to detect and report any instances of modern slavery within the supply chain and the Company has a Whistleblowing Policy through which effective reporting of such matters can be reported by staff internally.

Baird & Co. have also disseminated the United Kingdom's Home Secretary's guidance on how to respond to an incidence of Modern Slavery including issuing to these employees. The UK Modern Slavery Helpline 0800 0121 700 has also been shared with staff during training.

#### **SECTION 6: Effectiveness of monitoring Modern Slavery prevalence**

Baird & Co. have comprehensive policies, systems and controls, and due diligence procedures which are designed to protect the Company from exposure to fraud, money laundering and bribery and corruption. The controls also ensure the business is compliant with the Modern Slavery Act 2015 insofar as the detection of corruption and improper conduct by suppliers and counterparties.

The Company's policies and procedures are supported by a training program for all high risk and procurement staff, which ensures that employees are reminded of the red flags associated with modern slavery indicators of forced labour, and instructions are disseminated on how to report any suspected instance of modern slavery when detected.

**APPROVAL FOR THIS STATEMENT**

**This statement was approved by the Board of Baird & Co. Ltd on 18 June 2025 and it will be reviewed and updated annually.**