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1. STATEMENT

Modern Slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

2. POLICY

The Company is committed to ethical standards and sound governance. Setting standards of transparency, accountability, integrity and objectivity in relation to the management of its activities. It adopts a zero tolerance to modern slavery and human trafficking and all forms of corruption and bribery directly and indirectly associated with these criminal acts.

The Company expects the same high standards from all its contractors, suppliers and other business partners. As part of the contracting processes, specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children are included. The Company calls upon all organisations that it engages with to influence their supply chains by improving transparency and accountability to assist in the eradication of modern slavery and human trafficking.

This policy applies to all persons working for the Company or on behalf in any capacity e.g. employees at all levels, partners, agency workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

The Company annual statement will provide information to supplement this policy, including details of activities, supply chains and actions taken to support this policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 March 2019.

This is our first annual statement and it contains a summary of progress undertaken within the first year.

3. OUR COMPANY

We deliver construction and engineering projects for the public and private sector in the United Kingdom and Ireland. We engage with a number of public and private sector organisations in the delivery of our business.

4. RESPONSIBILITY

The Partners have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

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

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

All persons that this policy applies to must read, understand and comply with this policy.

5. COMPLIANCE

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.

- 5.1 You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 5.2 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 to your Line Manager or the HR Manager.
- 5.3 If you believe or suspect a breach of this policy has occurred or that it may occur, you must report it in accordance with our Whistleblowing Policy as soon as possible.
- 5.4 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 HR Manager immediately.
- 5.5 Adhere to related contract of employment details and the Company policies and procedures e.g. Harassment and Bullying, Equality & Diversity and Whistleblowing.

6. RISK ASSESSMENT

We reviewed the risk assessment against the Company activities using the criteria of the main areas where interaction with people occur, that could be open to modern slavery and human trafficking. The main areas for focus following the risk assessment were sub-contractor's employees and supply chain employees.

7. ACTION TAKEN SINCE APRIL 2019

Following the risk assessment, we have actioned the following:

- Developed the Modern Slavery and Human Trafficking policy, raising general awareness across management and employees via our newsletter (April 19), HSEQ monthly meeting and minutes (April 19) while providing ongoing accessibility on our shared drive;
- Verified the identity of each employee through photographic evidence and their right to work in the UK.
- Implemented Modern Slavery and Human Trafficking training as part of our onboarding process. Highlighting the risk our business faces from modern slavery in its supply chain;
- Additional training will be provided as necessary;
- Published the policy on the Company website; and
- Raised awareness of this published statement and the Modern Slavery Act by notifying organisations in our Frameworks, Delivery Partnerships and other Companies with which we regularly engage, communicating that they must comply with the relevant legislation and there is a zero-tolerance approach.

8. SCOPE OF OUR PROCUREMENT ACTIVITIES

Our procurement activities take place in the United Kingdom and Ireland; and our contractors and suppliers are predominantly UK and EU based.

We occasionally procure meeting and conference venues to support our general business activities and these are selected to ensure good value for money. We note that the hotel and hospitality trade recognise the risk of modern slavery within their sector and a Stop Slavery Hotel Industry Network is developed by the industry.

9. PROCUREMENT AND TENDER PROCESS IMPROVEMENTS

Existing tender documentation includes the mandatory exclusion of any bidder who has been convicted of an offence under the Modern Slavery Act 2015.

10. DUE DILIGENCE

As part of the Company due diligence process, the Company requests confirmation that our supply chains adapt a zero tolerance to the Modern Slavery Act 2015.

11. EXPECTATION AND ENCOURAGEMENT

We expect all Delivery Partners, organisations within our Frameworks and other companies we engage with to ensure their goods, materials and labour-related supply chains:

- Fully comply with the Modern Slavery Act 2015; and are
- Transparent, accountable and auditable; and are
- Free from ethical ambiguities.

We encourage Delivery Partners, organisations within our Frameworks and other companies we engage in housing, construction, land and real estate to read and apply as appropriate 'Advancing Responsible Business Practices in Land, Construction and Real Estate Use and Investment', a joint publication between the United Nations Global Compact and the RICS.

12.BREACHES

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

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

13.KEY CONTACTS

Individuals with information or evidence of non-compliance with the Modern Slavery Act in connection with our supply chains or businesses we engage with or hold information that could lead to the identification, discovery and recovery of victims.

Modern Slavery Helpline 08000 121700

Crimestoppers 0800 555111

A handwritten signature in black ink, appearing to read 'E. McKenna'.

Eugene McKenna

Managing Partner