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### 1. STATEMENT

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by the Company during year 2021|2022 ending 1 April 2022 to prevent modern slavery and human trafficking in its business and its supply chains.

### 2. POLICY

The Company is committed to conducting business with honesty and integrity; treating people with dignity and respect and complying with applicable laws, regulations and treaties. The Company does not tolerate modern slavery and human trafficking and all forms of corruption and bribery directly or indirectly associated with these criminal acts.

The Company expects the same high standards from all its contractors, suppliers and other business partners. 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, directors, 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 2022.

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

It should be noted that it is the impact of the behaviour that is relevant and not solely the motive or intent behind it.

### 3. OUR COMPANY

We deliver civil engineering and construction projects for the public and private sector in the United Kingdom and Ireland. We have 2 offices and 130 employees, engaging with a number of public and private sector organisations in the delivery of our business. With over 40 live projects and 3500 supply chain members.

The structure of the Company consists of 3 business divisions BUILDING GB, BUILDING NI | ROI and CIVILS UK & ROI which is supported by our core support teams IT, HRD, SHEQ, FINANCE & BUSINESS DEVELOPMENT.

#### 4. RESPONSIBILITY

The Directors 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 HRD 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.

- You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 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. The response protocol is:
  - Serious concern call the police on 999.
  - Suspect call modern slavery helpline or police on 101.
  - Guidance contact your Line Manager or the HRD Manager.
- 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.
- 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 HRD Manager immediately.
- Adhere to related contract of employment details and the Company policies and procedures e.g. Harassment and Bullying, Equality & Diversity and Whistleblowing.

#### 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.

#### 6. ACTION TAKEN SINCE APRIL 2019

Following the risk assessment, we have actioned the following:

April 2021 - 2022

- Continuation of the Verified Right to Work in the UK and Proof of Identity for every new employee.
- Continuing to deliver Modern Slavery and Human Trafficking training as a mandatory part of our onboarding process.
- 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.
- 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.
- A Real Living Wage Registered employer since October 2020
- Raised the Company Modern Slavery awareness training plan in SHEQ monthly meeting
- Completed a knowledge gap analysis on Modern Slavery within the Company.
- Raised general awareness of modern slavery in our bi-monthly newsletter.
- Developed and delivered modern slavery awareness training based on the gap analysis within the Company, collaborating with the Stronger Together team.
- Developed and implemented an internal e-learning TBT on modern slavery which is easily accessible to all Company employees and anyone working on a Company site.
- E-learning QR code and link on modern slavery training made freely available to our suppliers and contractors through our QR code.
- E-learning QR code and link on modern slavery made freely available on our website.
- Reviewed and updated the Modern Slavery and Human Trafficking policy and procedure (April 2022).
- Commercial Associate Director completion of Stronger Together Training specifically on procurement.

## 7. 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.

## 8. 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.

## 9. 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.

## 10. 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.

## 11. BREACHES

11.1 Any employee who breaches this policy will face disciplinary action, up to and including gross misconduct.

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

## 12. REVIEW

We have key performance indicators in place focusing on our risk areas and compliance which are reported and reviewed on an ongoing basis by the relevant parties responsible for supply chain engagement and employees.

## 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



Aaron Hughes  
**Managing Director**