

COMPLIANCE WITH MODERN SLAVERY ACT 2015 POLICY

Issue reference:	GH DCI-0001	Doc No:	GHPol 04
Issue No:	05	Issue Date:	14.02.23

The Company is committed to improving our practices to combat slavery and human trafficking.

We are committed to ensuring there is no slavery or human trafficking within any part of our business or its supply chains. We strive to achieve this through our recruitment policies and procedures and supplier due diligence processes. For our third-party suppliers we aim to focus on high-risk industries in this area and collaborate with others to concentrate our resources and increase our leverage with brands.

Organisation's structure

We are a provider of Construction services in the Property and Construction sector. Our home office is in the UK, and we have sites across the UK and ROI.

Our business

Our primary business is construction, which is managed by adopting a best practice, continual improvement approach in accordance with our ISO accredited procedures and processes.

Our supply chain

Our supply chain both trade subcontractors, suppliers and consultants are primarily UK currently based, any European companies we may engage have a UK base therefore all are low risk. We expect our supply chain to have appropriate anti-slavery and human trafficking policies and process in place to ensure compliance with the Modern Slavery Act 2015

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our business and in our supply chains. This Policy reflects as far as practicable our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business and supply chains.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk:

The Company employs solely within the UK & ROI. Our recruitment procedures ensure that all applicants are legally entitled to work in the UK or ROI. All successful applicants must produce on their first day, one of the following: their passport or their driving licence (original documents only, no photocopies). In addition, in order to comply with the Asylum and Immigration Act 1996 requirements, evidence of the right to reside and work in the UK or ROI, including work permits and visas, is sought from all successful applicants and checked by HR.

The Company ensures all direct and indirect colleagues are paid at least the living wage. We carry out reasonable and practical due diligence in the sourcing of goods and services. The supplier vetting process requests information from potential suppliers to assess their suitability as a supplier and provide evidence of their compliance of labour standards, the Modern Slavery Act and the Asylum and Immigration Act, as well as covering other areas of company information, policies and procedures. This enables the procurement team to identify and assess any potential risks.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains;
- Protect whistle blowers.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme.

If we discover, or are made aware, that we had been associated with human rights violations, including any acts of modern day slavery and human trafficking in the supply chain, we will take steps to rectify the situation, taking account of the interests of those whose rights are being violated. No such instances have been brought to our attention.

As a business we have adopted Constructionline to support our prequalification process for the assessment, onboarding and management of our key supply chain. Constructionline is industry recognised as one of the market leading prequalification standards and allows our supply chain to demonstrate the steps taken to ensure that slavery and human trafficking is not taking place in their business.

These processes and procedures help and assist in identifying areas risk so that we can review in more detail. This is an ongoing exercise.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our colleagues.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.