



Modern Slavery Act Statement

This statement outlines how the Firm fulfils its obligations under the Modern Slavery Act 2015.

We are a construction company based solely in the United Kingdom. Our head office is in Drayton, Norwich, with regional offices located across East Anglia.

We are committed to act ethically, with integrity and transparency in all our business dealings and to implement effective systems and procedures to, as far as practically possible, ensure that slavery and human trafficking does not take place within our business or supply chain.

The Firm has a zero tolerance to this issue and likewise expects our people, suppliers and subcontractors to have the same. We all have a duty to be alert to the risks in our business and the wider supply chain. Staff are expected to report concerns that they have to their respective Managers, who in turn are required to act if concerns are raised.

Our Supply Chain

In common with the construction sector, we have a large and complex supply chain, due to the nature of our operations and sectors within which we operate.

We work with suppliers that provide supply and installation, raw materials, finished goods, labour only providers, employment agencies through to consultants and specialist advisors. All suppliers, regardless of spend are vetted, including collection of evidence related to employment policy and modern slavery.

When sourcing materials we evaluate ethical and sustainability and local sourcing opportunities where at all possible. Where materials are specified by client's we work collaboratively to influence their choices including selecting sustainable and ethically sourced/produced materials.

Assessing Risk

In 2020 we commenced an analysis of our material procurement and their sources, enabling us to reduce the risk of such products being directly or indirectly linked to modern slavery or human trafficking.

Where this risk cannot be reduced to an acceptable level we will where possible source alternatives that meet our ethical and sustainability aims. By working with long established supply chain partners, we have developed collaborative relationships that enable us to challenge and work together to achieve these aims.

What we are doing

We proactively promote awareness via all colleagues and supply chain partners and reporting of any suspected incidents of modern slavery, unfair treatment or coercion either within our businesses or within our supply chain.

What we have done during 2020

Following our 2019 Modern Slavery report, we have undertaken the following actions:

- We have carried out a gap analysis on our supply chain and developed an action plan to ensure that these suppliers are further engaged in our aims and compliance with our requirements.
- We have implemented Construction Line Gold standards high spend suppliers. This sets out higher standards for environmental, social sustainability and modern slavery vigilance. Construction Line manages the process and reporting of completion and compliance.
- Modern slavery has now been incorporated in our responsible recruitment policy.
- We recruited a Head of HR & Training who has significant experience of working in other sectors that are recognised as leading on the prevention of human trafficking and modern slavery, including campaigns and frameworks such as Stronger Together, ETI and SMETA.
- We launched a new intranet, Connect and have developed resources accessible to all colleagues such as induction materials, posters and toolbox talks.
- We have become associate members of Stronger Together to support our aims.

Plans for 2021

Our plans for 2021 build on work carried out in 2020.

- Implement mandatory modern slavery e-learning, with a target of 100% of our colleagues that procure and manage labour and sub-contractors by the end of 2021.
- Senior representatives from across the organisation to have attended the Stronger Together training course - Tackling Modern Slavery in the Construction Sector.
- Reinforcement of our expectations in relation to right to work and responsible recruitment practices through our supply chain, including Construction Line Gold certification to all key members of the supply chain.
- Include modern slavery materials in our on-line induction which is rolled out to our supply chain before working on site, including posters and support material and confidential reporting/support at all locations.
- Continue to deliver toolbox talks at all locations on the identification and prevention of human trafficking and modern slavery.
- Sign up to the GLAA Construction Protocol.
- Complete the Crown Commercial Modern Slavery Assessment Tool (MSAT).
- Carry out GLAA active licence checks on labour only employment agencies.
- Implement MRZ checking software to check validity of identity documents as part of our recruitment process.

Accountability

The Group Company Secretary is accountable to the Board and responsible for overseeing compliance with the Modern Slavery Act and annual preparation of the Modern Slavery Act statement.

Declaration

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery statement for the financial year ending 31st December 2020.

Signed:

A handwritten signature in black ink, appearing to read 'R J Alflatt', written in a cursive style.

R J Alflatt
Group Company Secretary