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|  | <b>Safety Management System</b>  | <b>SMS-P17</b><br><b>Rev 1</b><br><b>08/03/2019</b> |
|   | <b>Modern Day Slavery<br/>and Human Trafficking<br/>Policy Statement</b> | <b>Page 1 of 2</b>                                  |

JCM Groundworks Ltd. recognises that modern slavery, which encompasses slavery, servitude, human trafficking and forced labour remains a hidden blight on our global society and we have a zero-tolerance approach to any form of it. We are committed to acting ethically and with integrity and transparency in all business relationships and to having effective systems and controls in place to safeguard against any form of modern slavery taking place within our business and supply chain.

Our aim is to identify any instances by alerting employees to the risks, however small, in our business and in our supply chain and they are expected and encouraged to report concerns to management—who are expected to act upon them.

Company activities are varied through multiple disciplined areas and encompass Civils Building works in the Multi Utilities and Construction Sectors.

Due to the varied sectors and services provided we have a multi-disciplined supply chain to support us through the different aspects and provisions of our business.

This policy statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps JCM Groundworks Ltd. has taken and is continuing to take to ensure modern slavery and human trafficking is not taking place within our business or supply chain. It takes into account, and supports, the policies, procedures and requirements documented in our Safety Management System. The implementation and operation of this management system underlines our commitment to this policy statement. Procedures supporting our slavery and human trafficking statement have been established, including disciplinary procedures where they are breached. Additional procedures ensure this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

The Company will achieve these aims by our initiative to identify and mitigate risk in the following ways (But not limited to):

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.).
- Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work;
- We encourage the reporting of concerns and the protection of whistle blowers.
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

We operate an approved supplier process and maintain an Approved Suppliers List. Suppliers of goods and materials we purchase are mainly UK based and we conduct due diligence on them and our subcontractors including online searches to ensure each organisation has never been convicted of offences related to modern slavery. Additionally, our approval process for subcontractors includes them providing a copy of their Modern Day Slavery Act 2015 Policy Statement with their completed SMS-F36 Sub-Contractor Questionnaire.

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 relevant employees. All Directors have been briefed on the subject.

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We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of Audits by Directors, Managers Safety Managers and Safety Advisors;
- Use of labour monitoring and payroll systems.
- Monitoring of our supply chain to ensure their understanding of compliance is in line with our expectations.

For transparency a copy of this policy statement is provided to all employees, available from our web site and to anyone who makes a written request for one, and will be provided within a 30 day period beginning with the day on which the request is received.

**This policy applies to all those employed by JCM Groundworks Limited**

Date: 8<sup>th</sup> March 2019

Signed:



Michael Montague  
Managing Director  
JCM Groundworks Limited