
Modern Slavery Act 2015 Anti-Slavery & Human Trafficking Policy Statement

POL-063

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the "Act") and sets out the steps that GRAHAM has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

The Act requires certain businesses to provide disclosure concerning their efforts to address the prevention of slavery and human trafficking in their supply chains. These disclosures are intended to provide clients the ability to make better informed decisions about the services they buy and companies they support.

GRAHAM is a multi-skilled organization operating in the construction, asset management and project investment sectors, offering services to a diverse range of clients in the UK and Ireland. The group comprises a holding company, John Graham Holdings Limited and three main subsidiary companies; John Graham Construction Limited, GRAHAM Asset Management Limited and GRAHAM Investment Projects Limited.

Our supply chain includes companies who supply raw materials, specialist trade contractors who undertake supply and fix contracts, labour-only subcontractors and specialist professional organisations that provide a range of services across the portfolio of projects we deliver for our clients.

GRAHAM is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations and those of our supply chain. GRAHAM recognizes that slavery and human trafficking can occur in many forms. Therefore, throughout this disclosure we use the terms "slavery and human trafficking" to encompass the various forms of coerced labour as envisaged by the Act.

We believe that working in partnership with our clients, community stakeholders and supply chain in a sustainable way enables us to find more practical and safer methods of ethical trading free from slavery and human trafficking.

We conduct regular audits of our operations to safeguard against any form of slavery and human trafficking taking place within the business or our supply chain.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- POL-58 Anti-bribery policy
- POL-62 Anti-slavery policy
- POL-30 Recruitment policy
- POL-41 Whistleblowing policy
- POL-01 Business Ethics policy

GRAHAM operates a preferred supplier database and conducts due diligence on all suppliers before allowing them to become a preferred supplier. Our anti-slavery policy and compliance with the Act, forms part of our contract with all suppliers and subcontractors, and they are required to confirm that no part of their business operations contradicts this policy or breaches the Act. We will only trade with those who fully comply with this policy and may terminate the contract at any time should any instances of slavery and human trafficking become apparent.

GRAHAM regularly provides information and awareness training so that staff understand the signs of slavery and human trafficking and know the action to take if they suspect that it could be occurring.

This statement has been approved by our Board of Directors, who will review and update it as necessary on an annual basis. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the GRAHAM Slavery and Human Trafficking Statement for the financial year ending 31 March 2018.



MICHAEL GRAHAM
Group Executive Chairman