
Anti-Slavery & Human Trafficking Policy

POL-062

1. Introduction

An anti-slavery and human trafficking policy designed to assist commercial organisations comply with the Modern Slavery Act 2015. The policy gives workers, contractors and other business partners guidance on slavery and human trafficking and the measures taken by the organisation to tackle slavery and human trafficking in the its business and supply chains.

2. Policy Statement

- 2.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. John Graham Construction Ltd. have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 2.2. John Graham Construction Ltd. are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 2.3. This policy applies to all persons working for John Graham Construction Ltd. or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

3. Responsibility For The Policy

- 3.1. The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2. The SHE Director, John Graham Construction Ltd. is the Compliance Manager and has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.3. 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.
- 3.4. Regular audits are undertaken by the SHE Team to ensure that the business and the supply chain are in compliance with this policy. These are reported on an annual basis through the Modern Slavery statement.
- 3.5. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Manager.

4. Compliance With The Policy

- 4.1.** Employees must ensure that they have read, understand and comply with this policy.
- 4.2.** 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. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3.** Employees must notify their manager or the Compliance Manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. They 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.
- 4.4.** If an employee believes or suspects a breach of this policy has occurred or that it may occur, they must report it in accordance with our Whistleblowing Policy as soon as possible.
- 4.5.** 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 an employee believes that they have suffered any such treatment, they should inform the Compliance Manager immediately. If the matter is not remedied, and they are an employee, they should raise it formally using our grievance procedure.

5. Communication & Awareness Of This Policy

- 5.1.** Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the on-boarding process for all individuals who work for us, and regular training will be provided as necessary.
- 5.2.** Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. Breaches Of This Policy

- 6.1.** Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.
- 6.2.** We will terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.