

## **Introduction**

Amalgamated Construction Ltd (AmcoGiffen) is fully committed to the prevention of Modern Slavery and Human Trafficking and we will not tolerate or condone any such identified act within any aspect of our business activities.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015, it sets out the activities undertaken by the Company in respect of the prevention of Modern Slavery and Human Trafficking and constitutes the Company's annual Modern Slavery statement for the financial period **1 October 2018 to 30 September 2019**.

## **Organisational Structure**

AmcoGiffen and its subsidiaries provide a diverse range of specialist construction and engineering services in support of the creation and maintenance of assets for both public and private sector customers in the Infrastructure Sector.

Our work is conducted solely in the United Kingdom and delivered by a directly employed workforce all of whom are fully eligible to work within the United Kingdom.

AmcoGiffen recruit either directly or via a limited number of reputable recruitment partners, who are required to successfully complete our supply chain due diligence process, prior to being accepted as a recruitment partner.

AmcoGiffen believe that no worker should pay for a job. The cost of the recruitment of ANY worker engaged by AmcoGiffen will be borne by AmcoGiffen not the worker and, as part of our due diligence and risk identification processes, we will ensure that our supply chain and recruitment partners also adhere to this principle.

## **Supply Chain**

Given the nature of our organisational structure, our model of directly employed work delivery and our use of a UK based Supply Chain, we consider that any exposure to risk of Modern Slavery or Human Trafficking is extremely low and that should any risk exist it is most likely to be within the extended Supply Chain.

We work closely with the Tier 1 providers of our Supply Chain in the identification of such risks to ensure they are addressed in an appropriate manner.

## **Modern Slavery Policy**

AmcoGiffen has implemented a comprehensive policy in respect of Modern Slavery and Human Trafficking.

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This policy and supporting procedures details our business approach to the prevention of Modern Slavery and Human Trafficking, along with the processes used to support and deliver our commitment. This policy and commitment has been communicated to our employees and Tier 1 Supply Chain partners for their information and action.

We operate a risk based approach to the identification of Modern Slavery and Human Trafficking, the principle of which is based on the location of the product or service, industry sector, supplier relationships and existing data held, supported by additional information and guidance obtained from, but not limited to, sources such as the Global Slavery Index, Corruption Perceptions Index and US Department of Labour Lists of Goods and Suppliers.

### **Due Diligence and Identification of Risk**

AmcoGiffen's policy of direct employment is supported by robust processes which ensure that an individual's identity is confirmed and they have a legitimate right to work in the United Kingdom. This policy and the right to work checks undertaken by our staff significantly reduces the risk of directly employing forced labour or those who may be subject to human trafficking.

Where AmcoGiffen do utilise labour only sub-contractors we have introduced due diligence checks to ensure that, as a minimum, labour providers comply with our commitment to the Prevention of Modern Slavery and their processes for recruitment contain no illegal labour practices.

Notwithstanding that AmcoGiffen's Supply Chain is primarily UK based, we have instigated a risk assessment of supply chain activities to identify and prioritise any areas which may pose a risk of Modern Slavery.

### **Our activities during 2018/19 included:**

- Completing a data analysis in respect of identified high risk suppliers and monitoring the identified high risk suppliers.
- Undertaking a defined programme of desktop audits in relation to identified key high risk suppliers.
- Continuous review of our Procurement and Supply Chain and their processes, to understand the activities they undertake, to ensure that Modern Slavery and Human Trafficking is not taking place within our supply chain.
- Incorporating our Modern Slavery requirements into our Supplier Reviews and Vendor Assessment and Appraisal processes for new suppliers.
- Ensuring that all existing suppliers renew their Vendor Assessment after a period of three years. This has meant that all new suppliers are immediately included and that any remaining Tier 2 and Tier 3 elements of the existing AmcoGiffen supply chain will have been captured by the latter part of 2019 at the latest.

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**Our objectives for the financial year 2019/20 include:**

- To undertake a continued programme of supply chain desk top audits of specifically identified high and medium risk suppliers.
- To undertake a further review of our existing supply chain to ensure that any potential new or existing suppliers have not changed their status in terms of “risk”.
- Engaging with our Key Strategic Suppliers and Industry bodies to engage with their Supply Chains to discuss and understand capability, best practice and learning on Modern Slavery to continuously improve our approach to Modern Slavery.
- Incorporating Modern Slavery as a priority into 360 degree reviews with Key Supply Chain partners to ensure no new risks of Modern Slavery have been introduced in their practices.

**Communication and Training**

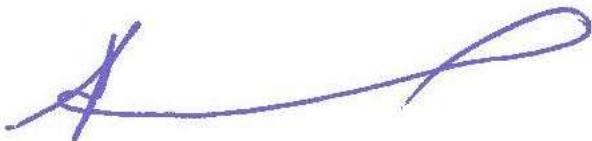
Our commitment to the prevention of Modern Slavery and Human Trafficking emanates directly from our Board of Directors. Their leadership and commitment to this important social issue has been clearly communicated both internally to employees and externally to subcontractors and Tier 1 Supply Chain partners.

Whilst all employees have received awareness training in relation to Modern Slavery, employees who have a direct responsibility and involvement for the engagement of workers and for dealing with supply chain matters have, or will, receive appropriate levels of training in these issues.

**Commitment**

The Board of Directors have reviewed, accept and fully support this statement and formally approved it on 23 March 2020.

We acknowledge that we are still in the early stages of a long term strategy and our approach to the Prevention of Modern Slavery and Human Trafficking will undoubtedly evolve year on year. We will utilise our annual statements to publicly reaffirm our continued commitment and to communicate this evolution, including the steps we have taken and will continue to take, to deal with this morally and socially important issue.



Andries Liebenberg

**Managing Director, Amalgamated Construction Ltd (AmcoGiffen)**

23 March 2020