

### Modern Slavery

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AmcoGiffen (Amalgamated Construction Ltd and Giffen Group Ltd) is fully committed to the eradication of Modern Slavery in all its forms and as a Company we will not engage in, nor will we condone or tolerate, any act of Modern Slavery within any aspect of our operations.

Modern Slavery is a crime which occurs in many forms and for the purpose of this Policy includes any act of slavery, servitude, bonded, forced or compulsory labour, child labour or human trafficking. All of these acts are normally conducted for the purposes of either personal or commercial gain, and without exception, result in the abuse and exploitation of an individual's human rights.

As a Company we will act transparently, ethically and with integrity both internally and across all of our business relationships. Appropriate action will be taken in response to any identified act of Modern Slavery and the processes and control measures we implement in support of this Policy aim to prevent, in so far as we are able, the opportunity for acts of Modern Slavery to arise.

Our approach to Modern Slavery, including our control measures, is contained within supporting Procedures. However, as a minimum we will:

- Identify, by Risk Assessment, and prioritise which parts of our business and Supply Chain are at most risk of Modern Slavery so that we can focus on those areas;
- Communicate our commitment to the Supply Chain using the Vendor Assessment, Supplier Appraisal and Procurement processes and engage with them, as appropriate, to understand the measures being taken to ensure that Modern Slavery is not occurring within their business;
- Introduce and implement, based on our Risk Assessment, appropriate due diligence activities which enable us to confirm, to the fullest extent possible, that Modern Slavery is not occurring within our Supply Chain;
- Prepare and publish on our Company website an annual Modern Slavery and Human Trafficking Statement which details the steps being taken to support the prevention of Modern slavery within our business and Supply Chain;
- Through appropriate training, raise employee awareness of Modern Slavery.

All employees, agency/freelance workers or sub-contractors, who perform work at any site or location operated by the Company will be required to conform fully to the requirements of this Policy and its supporting Procedures. This includes reporting any suspected act of Modern Slavery identified within the workplace to either their Line Manager or the HR Team for investigation/action.

This Policy will be reviewed annually, as a minimum, to ensure its continued effectiveness.



**John Booth**  
Managing Director