

Modern Slavery

AmcoGiffen (Amalgamated Construction) is fully committed to the principles of the Modern Slavery Act 2015 and the eradication of modern slavery in all its forms. 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 identify and prevent, in so far as we are able, the opportunity for acts of modern slavery to arise.

Where instances of modern slavery are identified, we are committed to taking appropriate remedial action, including supporting affected individuals and working with relevant authorities where necessary.

Our approach to modern slavery, including our control measures, is contained within supporting procedures. However, as a minimum we will commit to:

- Legal compliance, ethical standards, and fundamental human rights as set out by the principles of the ILO/UN Guiding Principles.
- Operate robust recruitment and right-to-work verification processes and prohibit the use of worker-paid recruitment fees.
- 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.
- We expect all suppliers to adhere to our standards on modern slavery and may require contractual commitments, evidence of compliance, and participation in audits where appropriate.
- 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 for materials/labour sourcing, appropriate due diligence activities which enable us to identify, assess and mitigate the risk of modern slavery occurring within our operations and supply chain.
- Prepare and publish on our company website an annual Modern Slavery and Human Trafficking Statement in line with section 54(1) of the Modern Slavery Act 2015, which details the steps being taken to support the prevention of Modern slavery within our business and Supply Chain.
- Provide appropriate training to all colleagues, particularly those involved in procurement, recruitment and site management, to ensure they can identify and respond to modern slavery risks.

POL-HR-09 POLICY STATEMENT

This Policy is communicated to all colleagues and relevant stakeholders and is supported by detailed procedures. It forms part of our wider commitment to ethical business practices and respect for human rights.

All colleagues, agency/freelance workers or sub-contractors, who perform work at any site or location operated by the company will be required to fully conform 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 or via the requirements of POL-HR-12 Whistleblowing Policy.

We will monitor the effectiveness of our approach through appropriate performance indicators, such as supplier compliance rates, audit outcomes, training completion, and reported incidents.

This Policy and the associated Modern Slavery Statement are approved at Board level and are overseen by senior leadership to ensure accountability and effective implementation.

We are committed to continuous improvement in our approach to tackling modern slavery and will review this Policy annually to ensure it remains effective and aligned with legal and best practice expectations.



John Booth
Managing Director