

# MODERN SLAVERY STATEMENT

DOCUMENT NUMBER: OF-01-11-002

VERSION: 03

APPROVED BY: CAB

APPROVAL DATE: FEBRUARY 2024

# Contents

- Introduction..... 3
- Purpose..... 3
- Supply Chain Risk and Due Diligence ..... 4
- Training and Development ..... 5
- Relevant Policies..... 5
- Compliance with the Modern Slavery Act ..... 6



## Introduction

GMI Construction Group PLC is committed to eliminating acts of modern-day slavery from its own business and from its supply chains. We acknowledge and accept its obligations under the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the Company.

GMI Construction Group PLC is a privately held public limited company, engaged in all aspects of building and construction services and does not operate any overseas branches, nor does it conduct operations outside the United Kingdom. The Company's supply chains for both goods and services are predominantly composed of United Kingdom based entities. On occasion, the Company and those in its supply chain will source goods and services from overseas.

## Purpose

The board of directors of the Company has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Group HR Director, supported by the Supply Chain team and the Commercial Department, 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.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. In the next 12 months the business will be introducing new modern slavery and human trafficking e-learning training for all our colleagues. This learning module has been designed to raise colleague awareness of modern slavery and human trafficking and to help colleagues recognise their role in identifying and reporting concerns.

Modern Slavery is a crime and a serious 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 to exploit them for personal or commercial gain. We 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.



## Supply Chain Risk and Due Diligence

We are also committed to ensuring there is transparency in our own 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 our subcontractors, suppliers, and other business associates, 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.

All of our supply chain members are provided with assistance on "right-to-work" requirements and are asked to provide evidence of their teams' right to work through declaration on either Constructionline or via in-house questionnaire. We carry out a number of audits on our supply chain continuously. We also ask that our supply chain declare that their team members and subcontractors also have a right to work.

We will not support or deal with any business knowingly involved in slavery or human trafficking.

This policy applies to all persons working for us 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.

We operate solely in the United Kingdom and do not employ supply chain partners from outside of the UK, however we appreciate that this does not mean we are outside of the reach of modern slavery and human trafficking and the subsequent legislation.

We have assessed the risks within our own supply chain in line with global risk indicators and can confirm that the highest associated risks for our business are as follows:

- Risks associated with direct and indirect procurement of materials, particularly those manufactured outside of the UK which are at higher risk of using forced and/or child labour.
- Significant use of agency workers, temporary workers and migrant workers by our supply chain.
- Significant use of low wage unskilled manual labour by our supply chain; and
- Complex and global supply chains with multiple tiers, specifically the risk of forced labour is higher within the lower tiers where the Company is without oversight.

As a result of these identified risks, we have upgraded our supply chain due diligence and onboarding process from in house questionnaires, to working in conjunction with Constructionline and mandating that our supply chain hold a verified Gold accreditation. Constructionline is a robust and widely recognised prequalification for the construction industry which complies with PAS91 and the common assessment standard. We will be further upgrading and updating this process in the coming months.

Constructionline asks specific questions regarding modern slavery and human trafficking legislation, policies and procedures which are applicable to both our supply chain partners and their supply chains.

Our supply chain partners are required to confirm that they comply with the Modern Slavery Act 2015 and that they have undertaken the necessary due diligence on their own supply chains, to ensure compliance, including providing evidence thereof which is checked and verified. During audits, where verification and checks are not complete we do not release any subcontract orders or information.

Where products, materials or components are sourced from outside of the United Kingdom, we assess the risk of modern slavery and human trafficking within those supply chains and consider this within the selection process.

We also require that supply chain partners including consultants and particularly employment agencies, undertake all necessary checks for vulnerable workers including eligibility for working in the United Kingdom and ensuring that employees are paid a living wage into their own personal bank account.

We undertake toolbox talks and inductions with both our own employees and our supply chain directors and site teams to ensure they are aware of the signs to look for with victims of modern slavery, and the appropriate action to take should they suspect that something is not right. Any employee that raises a concern is covered by our whistleblowing policy.



We are also partners of the Supply Chain Sustainability School, to further improve our Modern Slavery and Ethical Trading position, but also to improve practical modern slavery training and awareness amongst our supply chains and highlight the importance thereof.

### Training and Development

The business implements in-house compulsory training through an e-learning module to all internal GMI staff with renewal required at least every three years. The module increases awareness of the risk of modern slavery and the associated risks of human trafficking. This will complement in house training for our own employees.

### Relevant Policies

GMI incorporates a number of different policies to ensure the business provides team members with the organisations approach to modern slavery and human trafficking.

Our Whistleblowing policy highlights encourage and enable colleagues to raise serious concerns within the Company rather than overlooking a problem or 'blowing the whistle' outside. The policy makes it clear that colleagues can do so without fear of victimisation, subsequent discrimination, or disadvantage and applies to all colleagues whether full/part time, temporary or permanent. It also covers suppliers and those providing services under a contract with GMI Construction.

## Compliance with the Modern Slavery Act

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. The business is currently introducing a full policy to describe the steps that our colleagues must take to assess where risk is the highest across the industry, where we have influence, and where we shall prioritise action.

Our colleagues 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.

The Company operates a whistleblowing policy which allows colleagues to raise any concerns over modern slavery (or any other issues) in confidence.

This statement has been unanimously approved by the Company's board of directors and the Company is committed to providing adequate training and investment to ensure that trafficking is not taking place within the organisation or within its supply chains.

This policy statement is to be published on the Company's website (with a link in a prominent place on the website's homepage) and reviewed on an annual basis.

This policy statement relates to the financial year of the Company ended on 30 September 2024.

Signed ..... 

Date ..... 6<sup>TH</sup> MARCH 2024

**Lee Powell**  
**CEO**  
**GMI Construction Group PLC**