

## MODERN DAY SLAVERY ACT 2015 POLICY STATEMENT

J. Coffey Group Limited (Company Registration No. 12472226) recognises that slavery and human trafficking remains a hidden blight on our global society. The aim of the Company is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them.

Company activities are varied through multiple disciplined areas such as: Structural Alterations, Sub & Superstructure works, Concrete & Builderswork packages, Main Contracting and works on Infrastructure.

We are committed to ensuring that there is no known Modern-Day slavery or human trafficking in our supply chains or parts of our business. Our Modern-Day Slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place. To further enhance our commitment and transparency we are 'B' members with SEDEX and have encouraged two of our main suppliers of our supply chain to take up membership as well. Other associated policies we employ are our Equal Opportunities, Diversity & Inclusion Policy Statement, Ethical Policy Statement & Industrial Relations Policy Statement.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. The implementation and operation of this management system underlines our commitment to this policy statement. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities

The Company has achieved these aims by our initiative to identify and mitigate risk in the following ways (but not limited to): -

- Training staff and making them aware of the issues associated with Modern Day Slavery by way of a presentation/company induction and by Tool Box Talks and poster display on site notice boards.
- Cooperation with 2<sup>nd</sup> Party Modern Day slavery audit
- More stringent vetting and investigation of our supply chain using comprehensive PQQ's to review compliance to MDS policy statement prior to engagement of service provision.
- Continually auditing & reviewing our practices for checking all employees are paid at least the minimum wage and have the right to work;
- Investment in PPAC right to work software system
- Maintaining our SEDEX B membership
- Maintaining our full membership to TISC Report
- To allow one of our main clients to audit our business using the SEDEX audit format which we successfully passed
- Becoming registered with the GLAA and having our logo applied to the GLAA Construction Protocol
- Director Level attendance at GLAA meetings
- The company has not and will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have provided training to relevant members of staff and all Directors have been briefed on the subject.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

Modern Day Slavery Act Policy Statement (Attachment 1.7)	Page 1 of 3	Revision 18 – 26.03.21
Uncontrolled Copy when printed or downloaded from the company intranet		

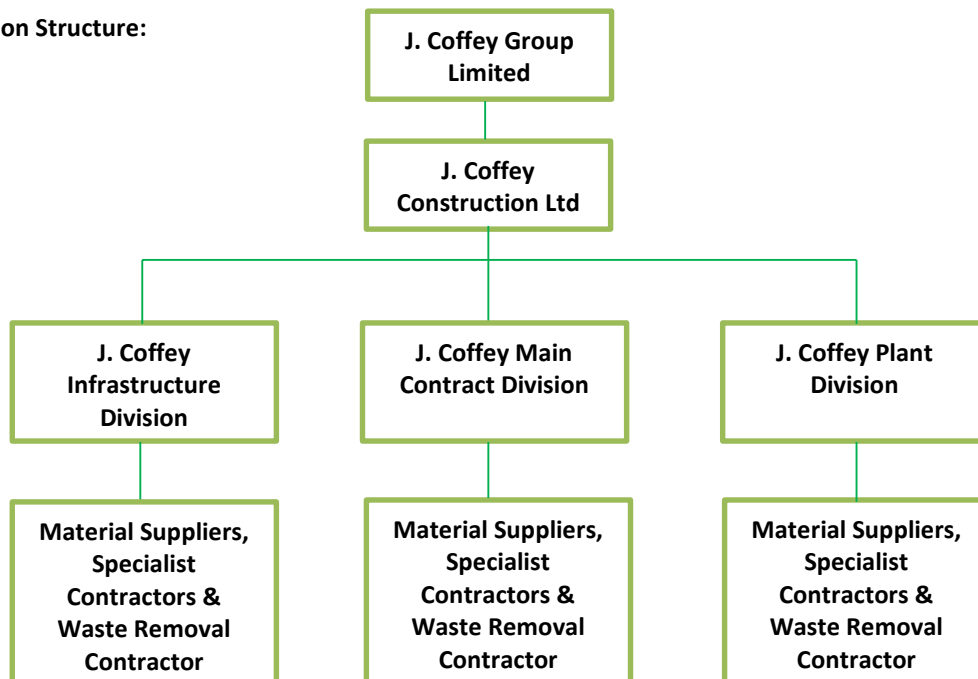
- Completion of Audits by Directors, Managers, Safety Managers and Safety Advisors;
- Use of labour monitoring and payroll systems;
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with our expectations.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement and is approved by the Board of Directors.

For transparency the company will publish the Modern-Day Slavery & Trafficking Act 2015 Policy Statement on its website for the public, consumers, employees, NGOs or investors to view.

The aims previously stated were all carried out during the company's financial year ending September 30<sup>th</sup> 2020 with similar aims to be repeated for the financial year ending September 2021

**Organisation Structure:**



**This policy statement applies to all employees and other personnel engaged in J Coffey Construction operations:**

Signed:

Date: 27.03.2021

Eddie Barrett  
Group Managing Director

**On behalf of J. Coffey Construction**

