

**Introduction**

Amalgamated Construction Ltd (AMCO) is fully committed to the prevention of Modern Slavery and Human Trafficking and 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 statement for the financial period 1 October 2016 to 30 September 2017.

**Organisational Structure**

AMCO 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.

**Supply Chain**

Given the nature of our organisational structure, 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 our Tier 1 members of our Supply Chain in the identification of such risk to ensure it is addressed in an appropriate manner.

**Modern Slavery Policy**

AMCO has implemented a comprehensive policy in respect of Modern Slavery and Human Trafficking. This policy and supporting procedures detail 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 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**

AMCO'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 AMCO do utilise labour only sub-contractors we are introducing 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.

## **ANNUAL MODERN SLAVERY STATEMENT 2016-2017**

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Notwithstanding that AMCO'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 2016/2017 included:**

- Completing a data analysis in respect of identified high risk suppliers and monitoring the identified high risk suppliers. A defined programme of desktop audits was undertaken 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 in our supply chain.
- Our Modern Slavery requirements have been incorporated into our 3 yearly supplier reviews and Vendor Assessment and Appraisal process for new suppliers. This ensures that all new suppliers are immediately captured and that the remaining Tier 2 and 3 elements of the existing AMCO supply chain will have been included by 2019 at the latest.

### **Our objectives for the financial year 2017/18 include:**

- To undertake a programme of 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 term of "risk".
- We will engage 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.
- Incorporate 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**

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 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**

12 March 2018

## Policy Statement

### Modern Slavery Policy



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.

Amalgamated Construction 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.

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, temporary workers, or sub contract employees, who perform work at any site or location operated by the Company will be required to conform fully with 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.

**Andries Liebenberg**  
Managing Director  
Amalgamated Construction Ltd

1<sup>st</sup> May 2017