

## Introduction

Amalgamated Construction Ltd (AmcoGiffen) 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 Modern Slavery statement for the financial period 1<sup>st</sup> October 2022 to 30<sup>th</sup> September 2023.

## Organisational Structure

AmcoGiffen and its subsidiaries provide a diverse range of specialist construction and engineering services in support of the creation and maintenance of infrastructure 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, supplemented where necessary by temporary workers supplied by reputable recruitment partners, all of whom are fully eligible to work within the United Kingdom.

AmcoGiffen recruits either directly or via a limited number of reputable recruitment partners, who are required to successfully complete our supply chain due diligence process, prior to being accepted as a recruitment partner.

AmcoGiffen believes that no worker should pay for a job. The cost of the recruitment of ANY worker engaged by AmcoGiffen will be borne by AmcoGiffen not the worker and, as part of our due diligence and risk identification processes, we will ensure that our supply chain and recruitment partners also adhere to this principle.

## Supply Chain

Given the nature of our organisational structure, our 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 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 Supply Chain Partners in the identification of such risks to ensure they are addressed and mitigated.

## Modern Slavery Policy

AmcoGiffen has implemented a comprehensive policy in respect of Modern Slavery and Human Trafficking.

This policy and supporting procedures details 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 colleagues and Tier 1 Supply Chain partners for their information and action.

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We operate a risk based approach to the identification of Modern 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

AmcoGiffen'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 AmcoGiffen do utilise labour only sub-contractors we have introduced 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.

Notwithstanding that AmcoGiffen'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 2022/23

We have:

- Previously completed a data analysis in respect of identified high risk suppliers which has enabled us to monitor the identified high-risk suppliers.
- Undertaken a defined programme of audits in relation to identified key high-risk suppliers.
- An Anti-Slavery and Ethical Procurement Policy
- Incorporated our Modern Slavery requirements into our supplier reviews and vendor assessment process for new suppliers and re-appraisal for existing members of the supply chain. This ensures that all existing suppliers renew their vendor assessment after a period of three years. This has meant that all new suppliers are immediately included and that any remaining Tier 2 and Tier 3 elements of the existing AmcoGiffen supply chain were captured by the latter part of 2019 at the latest.
- Employed an MSP model to our contingent labour supply chain to add in an extra layer of protection and assurance from all the associated risks posed by this market.
- All procurement staff have completed their CIPS Ethics Course which provides vital up to date information on modern slavery and areas of concern and risk.

#### Our objectives for the financial year 2023/24 include:

- Undertaking a further review of our existing supply chain to ensure that any potential new or existing suppliers have not changed their status in terms of "risk".

- Engaging 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.

### 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 colleagues and externally to subcontractors and Tier 1 supply chain partners.

All colleagues receive training in relation to Modern Slavery appropriate to their position and their involvement/responsibility in the engagement of workers and/or for dealing with supply chain matters.

#### Commitment

The Board of Directors have reviewed, accept and fully support this statement and formally approved it on 26<sup>th</sup> February 2024.

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 to communicate this evolution, including the steps we have taken and will continue to take, to deal with this morally and socially important issue.



John Booth  
Managing Director  
Amalgamated Construction Ltd (AmcoGiffen)

26<sup>th</sup> February 2024