



## **MODERN SLAVERY STATEMENT**

ARJ Holdings construction ltd and subsidiary companies is dedicated to preventing modern slavery and human trafficking from taking place within its business and supply chain and we place the same expectation on our suppliers.

### **1. Structure and supply chains**

The nature of our business requires that we work in conjunction with a range of suppliers, sub-contractors, agencies, and professionals.

ARJ operates exclusively in the highly regulated construction sector within the UK. All work is carried out in accordance with UK Government tax regulations and the UK's health and safety regime. The directors believe that this significantly reduces the risk of contravention of the Modern Slavery Act 2015.

There are several circumstances that reduce the risk of slavery and human trafficking within our supply chains. These include:

- Our work is not seasonal and does not rely on large numbers of unskilled labour at specific times of the year.
- Our work is generally skilled and requires competent, capable skilled operatives who carry validated trade or professional qualifications.
- Work on our sites is always monitored by our own site managers allowing a high degree of control and visibility of our own work.
- The majority of our material supplies that are used on our sites are generally sourced through UK distributors or UK companies within our supply chain, allowing strong commercial controls to be applied to encourage compliance with the Modern Slavery Act 2015.

Within the current financial year ARJ will ensure large companies caught by the Act will be expected to provide their slavery and human trafficking statements for our records and review when sent the PQQ. ARJ will request copies of our suppliers' statements on slavery and human trafficking, which will be taken as evidence that the organisation is starting to address this important issue and that in the current year, we can assume compliance with the Act.

### **2. Policies relating to slavery and human trafficking**

The following policies exist within our organisation which demonstrate our opposition to modern slavery.

- Anti-bribery Policy
- Whistle blowing policy

We will be developing further policies within the business such as a forced labour policy.

### **3. Due Diligence process**

As part of our efforts to monitor, manage and reduce the risk of slavery and human trafficking occurring within our business or supply chains, we adopt the following due diligence procedures:

Our processes aim to: Identify, monitor and manage areas of potential risk in our business and supply chains. We currently have a dedicated buying team that carry out all material purchases for the business but we will be carrying out further checks into the supply chain whether that be materials or sub-contractors.

- We are members of Constructionline, CHAS and Altius and we believe this reduces our risk of being affected by modern slavery issues.
- We ensure our suppliers are aware of our policies and encourage them to adopt the same high standards if a sub-contractor turns over £36 million plus then they will be required to submit their Modern slavery and human trafficking policy at the PQQ process
- We have a trained SHEQ advisor who has attended the modern slavery in construction workshop.

We intend on carrying out the following for 2020,

- Scrutinise any identified areas of risk within our business and supply chains.
- Train our buying department on Modern slavery and ensure that we only use reputable suppliers
- Train our site managers to be able to spot any signs of modern slavery out on site.
- Ask our suppliers to carry out their own checks on their suppliers.
- We ensure our suppliers are aware of our policies and encourage them to adopt the same high standards if a sub-contractor turns over £36 million plus then they will be required to submit their Modern slavery and human trafficking policy at the PPQ process

#### 4. Risk and compliance

We will carry out a risk assessment of key risks to contravention of the Act within our own businesses, our sub-contractor and material supply chain. This will identify the areas of concern and the mitigating acts that we will carry out this year and next to manage this risk as effectively as possible.

ARJ Holdings construction ltd and subsidiary companies will work to promote awareness amongst its employees of modern slavery and human trafficking within the UK construction industry. The company will ensure that their employee pay and conditions remain at a high standard, above those dictated by the Act. Any whistleblowing or complaint by an employee will be supported and investigated through our formal grievance procedure.

We believe that the risk of failing to comply with the Modern Slavery Act 2015 is low, because of the following measures:

- All employees are on full written conditions of employment that are standardised and checked for compliance with the Act.
- All employees are paid at or above the legal minimum wage
- Minimal casual labour is employed.
- Unpaid work experience or internships are regulated through a standardised risk assessment.

We intend on carrying out the following for 2020,

- We will carry out a review of our sub-contractors based on turnover and update our system with all the companies do not turn over £36 million because they do not have to submit their own statement so we will liaise and agree a way to measure their compliance.
- We will create an Emergency response plan for the business and ensure that this is communicated to all departments.

#### 5. Success and effectiveness of our policies, and processes

ARJ Holdings construction ltd and subsidiary companies will determine an appropriate set of benchmarks to ensure that slavery and human trafficking is not taking place in their businesses or supply chains and that, where there is an indication that there is a risk, it is investigated and managed. We will update policies and procedures annually with the effectiveness of our current measures and what we plan to do to improve them.

#### 6. Training

We ensure all employees are aware of the risks of modern slavery and human trafficking in our business and supply chains. Detailed below are examples of the training programmes we have in place to enable our employees to identify and report any potential breaches of the organisations anti-slavery and human trafficking policies.

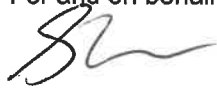
- Modern Slavery awareness notices to be displayed on our construction sites including the signs to spot potential victims.
- Company policy, procedures and best practice guides are available on our company network and these issues will be discussed in the management review meetings.

We intend on carrying out the following for 2020,

- We will appoint a Modern slavery champion within the business.
- Training will be provided within the current financial year to all site managers and buyers on the Act, its requirements and the support available. This may be repeated as required.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes ARJ Holdings construction ltd and subsidiary companies' slavery and human trafficking statement for the financial year ending 31<sup>st</sup> March 2020.

For and on behalf of ARJ Construction Ltd.



Sean Kneller  
**Director**

03/01/2020

**Date**