

# MODERN SLAVERY POLICY



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, subcontractors, agencies, and professionals.

We operate exclusively in the highly regulated construction sector within the UK. All work is carried out in line with applicable legislation, codes of practice and guidance. The directors believe this significantly reduces the risk of contravening 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 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
- Our work does not rely on large numbers of unskilled labour at specific times of the year
- Most materials supplied to our sites are sourced through UK distributors or UK companies within our supply chain, facilitating strong commercial controls

We will request copies of our suppliers' statements on slavery and human trafficking, which will be taken as evidence that the organisation is addressing this important issue and that in the current year, we can assume compliance with the Act.

## 2. POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING

In addition to this policy, our anti-bribery policy and whistleblowing policy demonstrate our opposition to modern slavery and related issues.

We will develop new policies as required, if any concerns are raised, or any incidents of modern slavery are reported.

## 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 are designed to:

- Identify, monitor, and manage areas of potential risk in our business and supply chains. This aim is supported by our commercial, buying and supply chain management teams
- 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 subcontractor has more than £36 million turnover, they will be required to submit their modern slavery and human trafficking policy at PQQ stage
- We have a trained SHEQ advisor who has attended the modern slavery in construction workshops

We intend on carrying out the following in the 2021-2022 financial year:

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

#### **4. RISK AND COMPLIANCE**

We will carry out an assessment of key risks to contravention of the act within our own businesses, our subcontractor 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 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 in the 2021-2022 financial year:

- 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
- Awareness training will be extended to all staff
- We will closely liaise with suppliers with £36 million+ turnover to develop a joined up approach to managing the risk of modern slavery across our projects

#### **5. SUCCESS AND EFFECTIVENESS OF OUR POLICIES, AND PROCESSES**

ARJ Holdings Construction Ltd and subsidiary companies will determine an appropriate set of benchmarks to reduce the risk of slavery and human trafficking in the business or our supply chains and that, where there is an indication of risk, that it is investigated and managed. We will update policies and procedures annually, including any plans to improve existing measures.

#### **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 sites, e.g. how to spot the signs of potential victims
- Company policy, procedures and best practice guides are available on our company network and these issues will be discussed in management review meetings

We intend on carrying out the following in the 2021 – 2022 financial year:

- 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.
- Awareness training to be rolled out to all staff

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 31st March 2022.

**For and on behalf of the directors**



**Sean Kneller, Director**