

## **Anderson Construction Ltd**

Anti-Slavery Statement 31<sup>st</sup> March 2019.

### **1. Introduction**

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year ending 31<sup>st</sup> March 2019.

This statement sets down Anderson Construction Ltd and its subsidiary Companies, commitment to preventing slavery and human trafficking in our business activities and the steps we are putting in place with the aim of ensuring that there is no slavery or human trafficking in our business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

The Group is managed through its Board of Directors and is supported by a strong senior management team.

Our supply chain includes contractors, subcontractors, consultants, service providers and other third-party representatives.

### **Risk Activities**

The main activities which could be considered to be at higher risk of modern slavery or human trafficking is through labour provision in the delivery of subcontractor trades through our onsite operations.

### **Policies**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to implementation of effective systems and controls in place to ensure slavery and human trafficking is not taking place anywhere within the business or our supply chain.

Our anti-slavery compliance team help to ensure that our Anti-Slavery Policy is complied with and to manage concerns or breaches. We also have a clear Whistleblowing Procedure which is available to all staff on Self Service. If there are any genuine concerns about any wrongdoing, these can be raised in confidence and without fear of disciplinary action.

### **Due Diligence Processes for Slavery and Human Trafficking**

The Company undertakes due diligence when taking on new suppliers and contractors, and regularly reviews its existing suppliers. During 2019 we are:

- We will continue to review our existing policies and procedures to take account of the Modern Slavery Act;
- We will continue to review our supply chain agreements when they are due for renewal to ensure compliance with our policy;
- We will continue to review our agreements with our contractors when they are due for renewal to ensure compliance with our policy;
- We will continue to review internal processes and deliver more awareness throughout the Group by way of Tool Box Talks.

## Further Steps

We have reviewed all our internal processes to understand what further steps can be taken to ensure that our obligations under the Act are met and that our Anti-Slavery Policy is effectively implemented and complied with. Some of the specific measures we are continuing to proceed with are

- Reviewing existing policies and procedures to ensure that our staff know how to, and are resourced to prevent or identify exploitation.
- Providing training for those involved in recruiting and supply chain management to raise awareness of slavery and human trafficking and its implications.
- Reviewing our procurement processes to consider what, if any, adjustments might be made to further reduce the level of risk of slavery and human trafficking in our supply chain.

This Modern Slavery and Human Trafficking Statement will be reviewed annually and updated when necessary. The Board of Directors endorse this policy statement and are fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:



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**Andrew Jay**  
**Group Managing Director**