

# Modern Slavery Policy



Modern slavery is an unquestionable and indefensible violation of an individual's basic human rights. J & D Pierce (Contracts) Ltd. recognizes that as a commercial organization it has a moral and social responsibility to take a zero-tolerance approach to modern slavery in all forms.

We are committed to preventing slavery and human trafficking in our corporate activities, and to ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

## Current Activity:

We undertake due diligence when considering taking on new suppliers, and are in the process of reviewing our existing suppliers. This due diligence includes:

- Understanding our supply chain so as to identify and assess particular product or geographical risks of modern slavery and human trafficking.
- Evaluating modern slavery and human trafficking risks through the completion of our sub-contractor and supplier pre-qualification process.
- Conducting supplier audits – our Quality Manager reviews all pre-qualification documents before a supplier or sub-contractor is used.
- Terminating our relationship with suppliers that do not meet our expectations or fail to improve their performance in line with an action plan.

We operate the following policies that assist our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

**Whistleblowing Policy** - we encourage all our employees, to report any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment, and any other matter of a serious nature.

**Sustainability Policy** - we are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to declare that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of the Company's Sustainability Policy will lead to the termination of the business relationship.

**Ethical Policy** - our policy sets out the core values which we expect to be observed throughout the Company.

## Training

The Company requires all employees working in supply chain management and relevant roles to complete training on how to assess the risk of slavery and human trafficking in relation to various aspects of the business, how employees can identify the signs of slavery and human trafficking and what should be done if this activity is suspected.

Awareness training is provided for all main board members and entity directors and any other staff in relevant and appropriate roles.

## Director Approval

This statement has been approved by the Director of J & D Pierce (Contracts) Ltd. who will review and update it annually.

This statement is made pursuant of section 54(1) of the Act and constitutes our slavery and human trafficking statement.

Signature

A handwritten signature in black ink, appearing to be 'D. Pierce', written over a horizontal line.

Position: Managing Director

Date: 06/07/2018