

# Modern Slavery Statement

GMI Construction Group's Policies & Procedures are subject to continuous monitoring and are amended as necessary.

If you have any questions regarding this process, please contact:

[HR@gmicon.co.uk](mailto:HR@gmicon.co.uk)

# Ownership

Document Title  
Probation Period

Role/Position  
Senior HR Business Partner

Accountable Director  
Catherine Freeley

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Specific Changes	Section/Page/Paragraph

# Approval record

Role/Authority	Name	Date of Approval
Group HR Director	Simon Mennell	

# Our Vision

To deliver projects with trust, integrity, and honesty throughout the UK.

## Delivering our purpose

To create high quality spaces and places for people to live, work and enjoy.

## Achieving our aim

To be a trusted partner by adding value for our people, our customers, and our communities.

## Building on our values

- We are a team
- We are respectful
- We are accountable
- We are agile
- We are determined to perform

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# 1 Scope

GMI Construction Group Plc is committed to eliminating acts of modern-day slavery from its own business and from its supply chains. We acknowledge and accept its obligations under the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the Company.

GMI Construction Group Plc is a privately held public limited company, engaged in all aspects of building and construction services and does not operate any overseas branches, nor does it conduct operations outside the United Kingdom. The Company's supply chains for both goods and services are predominantly composed of United Kingdom based entities. On occasion, the Company and those in its supply chain will source goods and services from overseas.

Modern Slavery is a crime and a serious violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our subcontractors, suppliers, and other business associates, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

We will not support or deal with any business knowingly involved in slavery or human trafficking.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

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## 2 Risk & Due Diligence

We operate solely in the United Kingdom and do not employ supply chain partners from outside of the UK, however we appreciate that this does not mean we are outside of the reach of modern slavery and human trafficking and the subsequent legislation.

We have assessed the risks within our own supply chain in line with global risk indicators and can confirm that the highest associated risks for our business are as follows:

- Risks associated with direct and indirect procurement of materials, particularly those manufactured outside of the UK which are at higher risk of using forced and/or child labour
- Significant use of agency workers, temporary workers and migrant workers by our supply chain
- Significant use of low wage unskilled manual labour by our supply chain; and
- Complex and global supply chains with multiple tiers, specifically the risk of forced labour is higher within the lower tiers where the Company is without oversight.

As a result of these identified risks, we have upgraded our supply chain due diligence and onboarding process from in house questionnaires, to working in conjunction with Constructionline and mandating that our supply chain hold a verified Gold accreditation. Constructionline is a robust and widely recognised prequalification for the construction industry which complies with PAS91 and the common assessment standard.

Constructionline asks specific questions regarding modern slavery and human trafficking legislation, policies and procedures which are applicable to both our supply chain partners and their supply chains.



The supply chain partners are required to confirm that they comply with the Modern Slavery Act 2015 and that they have undertaken the necessary due diligence on their own supply chains, to ensure compliance, including providing evidence thereof which is checked and verified.

Where products, materials or components are sourced from outside of the United Kingdom, we assess the risk of modern slavery and human trafficking within those supply chains and considers this within the selection process.

We also require that supply chain partners including consultants and particularly employment agencies, undertake all necessary checks for vulnerable workers including eligibility for working in the United Kingdom and ensuring that employees are paid a living wage into their own personal bank account.

We undertake toolbox talks and inductions with both our own employees and our supply chain directors and site teams to ensure they are aware of the signs to look for with victims of modern slavery, and the appropriate action to take should they suspect that something is not right. Any employee that raises a concern is covered by our whistleblowing policy.

We are investigating partnering with the Supply Chain Sustainability School in 2022, to further improve our Modern Slavery and Ethical Trading position, but also to improve practical modern slavery training and awareness amongst our supply chains and highlight the importance thereof.

This will complement in house training for our own employees as well as the annual CIPS Ethical Procurement training undertaken by our Supply Chain Manager.

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## 3 Responsibility of the Statement

The board of directors of the Company has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Group HR Director, supported by the Supply Chain Manager and the Commercial Department, has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. In the next 12 month the business will be introducing new modern slavery and human trafficking e-learning training for all our colleagues. This learning module has been designed to raise colleague awareness of modern slavery and human trafficking and to help colleagues recognise their role in identifying and reporting concerns.

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## 4 Compliance with the Statement

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. The business is currently introducing a full policy to describe the steps that our colleagues must take to assess where risk is the highest across the industry, where we have influence, and where we shall prioritise action.

Our colleagues are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

The Company operates a whistleblowing policy which allows colleagues to raise any concerns over modern slavery (or any other issues) in confidence.

This statement has been unanimously approved by the Company's board of directors and the Company is committed to providing adequate training and investment to ensure that trafficking is not taking place within the organisation or within its supply chains.

This policy statement is to be published on the Company's website (with a link in a prominent place on the website's homepage) and reviewed on an annual basis.

This policy statement relates to the financial year of the Company ended on 30 September 2023.

Signed.....  
Lee Powell – CEO

Date..... 13 DECEMBER 2022