

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Document Reference: OF-23-04-005

Version: 04

Approved by: CAB

Approval Date: OCTOBER 2024

MODERN SLAVERY POLICY STATEMENT

INTRODUCTION

GMI Construction Group PLC is committed to the eradication of modern slavery within its operations and supply chains. The Company acknowledges its responsibilities under the Modern Slavery Act 2015 and is dedicated to maintaining transparency both internally and with its suppliers of goods and services.

GMI Construction Group PLC is a privately held public limited company operating exclusively within the United Kingdom. While the Company does not maintain international branches or conduct overseas operations, it recognises that certain goods and services within its supply chain may be sourced from international markets.

PURPOSE AND RESPONSIBILITIES

The Board of Directors holds overall responsibility for ensuring compliance with legal and ethical obligations in relation to modern slavery. The Supply Chain Team and the Commercial Department have primary responsibility for implementing this policy, monitoring its effectiveness, responding to queries, and auditing internal control systems to mitigate modern slavery risks.

Management at all levels is responsible for ensuring that their teams understand and comply with this policy. As part of its ongoing commitment, the Company will introduce modern slavery and human trafficking e-learning training for all employees within the next 12 months. This training is designed to enhance awareness and equip employees with the knowledge to identify and report concerns effectively.

Modern slavery, encompassing slavery, servitude, forced and compulsory labour, and human trafficking, constitutes a severe violation of fundamental human rights. GMI Construction Group PLC adopts a zero-tolerance approach to modern slavery and is committed to ethical business practices and robust systems to prevent its occurrence within the organisation and its supply chains.

SUPPLY CHAIN RISK ASSESSMENT AND DUE DILIGENCE

In line with the Company's obligations under the Modern Slavery Act 2015, GMI Construction Group PLC ensures transparency in its business operations and supply chains. The Company expects its subcontractors, suppliers, and business partners to adhere to the highest ethical standards, including specific contractual prohibitions against forced labour, compulsory or trafficked labour, and exploitation of both adults and children. Furthermore, suppliers are expected to impose equivalent obligations on their own supply chains.

To ensure compliance, the Company has implemented rigorous due diligence measures, including:

- Verification of "right-to-work" documentation through Constructionline or internal questionnaires.
- Regular audits of supply chain partners.
- A requirement for supply chain members to confirm compliance with the Modern Slavery Act 2015 and to conduct their own due diligence.
- Withholding subcontract orders or engagement with suppliers until verification and compliance checks are satisfactorily completed.

Despite operating solely in the United Kingdom, GMI Construction Group PLC acknowledges the potential risks associated with modern slavery and human trafficking. An assessment of global risk indicators has identified key areas of concern:

- Procurement of materials manufactured outside the UK, particularly in high-risk regions for forced or child labour.
- Use of agency, temporary, and migrant workers by supply chain partners.
- Employment of low-wage, unskilled manual labour within the supply chain.
- Complex, multi-tiered global supply chains where oversight of lower tiers may be limited.

To mitigate these risks, the Company has enhanced its supply chain due diligence process by requiring subcontractors and suppliers to obtain Constructionline Gold accreditation, which aligns with PAS91 and the Common Assessment Standard. This accreditation includes comprehensive scrutiny of modern slavery policies and procedures across supply chain tiers.

Additional measures include:

- Risk assessments for products, materials, and components sourced outside the UK.
- Requiring employment agencies and consultants to conduct thorough checks on vulnerable workers, including eligibility to work and direct wage payments.
- Conducting awareness training through toolbox talks and inductions for employees and supply chain members.
- Ensuring whistleblowing protections for individuals who raise concerns.

GMI Construction Group PLC is also an active participant in the Supply Chain Sustainability School to strengthen its position on modern slavery and ethical trading.

TRAINING AND DEVELOPMENT

The Company provides mandatory e-learning training on modern slavery and human trafficking to all internal staff, with refresher training required at least every two years. This initiative is supplemented by additional in-house training for employees to ensure a comprehensive understanding of modern slavery risks and reporting procedures.

RELEVANT POLICIES

GMI Construction Group PLC has implemented various policies to reinforce its stance against modern slavery, including, however not limited to:

- **Code of Conduct:** Establishing ethical business practices and standards for all employees and supply chain partners.
- **Dignity at Work Policy:** Promoting a workplace environment free from harassment, discrimination, and exploitation.
- **Diversity Policy:** Ensuring inclusivity and equal opportunities for all employees, regardless of background.
- **Ethics Policy:** Defining the Company's commitment to integrity, transparency, and responsible business practices.
- **Recruitment and Selection Policy:** Ensuring fair and transparent hiring practices to prevent exploitation.
- **Whistleblowing Policy:** Encouraging employees and suppliers to report concerns confidentially, without fear of retaliation, discrimination, or disadvantage.

COMPLIANCE WITH THE MODERN SLAVERY ACT

All individuals working for or on behalf of GMI Construction Group PLC share responsibility for preventing, detecting, and reporting modern slavery risks. The Company is in the process of introducing a comprehensive policy outlining risk assessment methodologies, areas of greatest influence, and prioritisation of actions.

Employees are encouraged to report any suspicions of modern slavery within the business or supply chain at the earliest opportunity. Reports can be made confidentially under the Company's Whistleblowing Policy.

This statement has been approved by the Board of Directors, reflecting the Company's commitment to eradicating modern slavery and investing in training and compliance measures to ensure adherence to ethical standards. The policy statement will be published on the Company's website, with a prominent link on the homepage, and reviewed annually.

Financial Year Ending: 30 September 2025



GARETH JONES
GROUP MANAGING DIRECTOR

DATE: 1ST OCTOBER 2024