

POLICY STATEMENT

Modern Slavery and Human Trafficking



GMI Construction Group plc (the “Company”) is committed to eliminating acts of modern day slavery and Human trafficking from within its own business and from within its supply chains. The Company acknowledges and accepts 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.

The Company is a privately-held public limited company engaged in all aspects of building and construction services. The Company does not operate any overseas branches nor does it conduct operations outside the United Kingdom.

The Company relies on its supply chains in order to undertake construction projects and as such, the following areas have been identified as potential risk areas:

1. Employees

- a. We have procedures in place to check: (i) the identity of all new employees; (ii) their eligibility to work in the United Kingdom; and (iii) that they are paid directly into an appropriate personal bank account.
- b. All employees of the Company are paid at least the National Minimum Wage and the National Living Wage (as applicable) in force from time to time.
- c. Employees are made aware of their employment benefits in both their employment contracts and in internal communications.

2. Consultants

- a. Where appropriate, we include provisions in consultancy agreements and appointments confirming that consultants (in the case of individual consultants) and their employees (in the case of corporate consultants) are both eligible to work in the United Kingdom and comply with the terms of the Modern Slavery Act 2015.

3. Agency workers

- a. We aim to only engage agency workers from reputable suppliers that are on our preferred supplier list.
- b. We make enquiries into our preferred suppliers to ensure that they are compliant with all necessary legislation.

4. Sub-Contractors

- a. The Company’s subcontractors are predominantly United Kingdom based entities and the majority of these have long-standing relationships with the Company.
- b. We require that our subcontractors ensure and confirm that their employees are eligible to work in the United Kingdom and that they comply with the Modern Slavery Act 2015.
- c. We consider any breach or non-conformity of employment legislation when selecting subcontractors.
- d. We want all subcontractors that further subcontract and/or supply materials to consider the risk of modern slavery within their supply chains and make specific enquiries of this in the Company’s due diligence process.

5. Suppliers

- a. The Company’s supply chain is predominantly composed of United Kingdom based entities and the majority of these have long-standing relationships with the Company.
- b. On occasion, the Company (and those in its supply chain) will source goods from overseas. Where this takes place, the Company considers the risk of modern slavery and human trafficking as part of our selection process.

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

To allow employees to fully understand the risks of Modern Slavery and Human Trafficking in our supply chains and business we continue to provide awareness training to relevant members of staff. A briefing sheet will also be provided to all persons regarding Modern Slavery & Human Trafficking at inductions, prior to the commencement of work with the business.

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

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.

The directors and senior management shall take responsibility for implementing this policy statement.

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 2020.

Signed: .....

Andrew Bruce – Group Managing Director

Date: 25 November 2020