



ANTI-SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

This document outlines Gradon Construction Ltd.'s policy on modern slavery and human trafficking in accordance with s.54 of the Modern Slavery Act 2015. The company is committed to conducting all aspects of its business in an ethical and transparent manner and we acknowledge our duties and responsibilities under the Act.

It is our requirement, in line with company values, that all workers are treated with dignity and respect. We are fundamentally opposed to slavery, human trafficking, forced labour, child labour and all other exploitative practices in the workplace.

All contractors and suppliers with which the company does business, are expected not to engage in any such practices, or knowingly contract with third parties which do. Gradon Construction Ltd will terminate any business relations with contractors and suppliers found to be in breach of anti-slavery and human trafficking laws.

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, agents, contractors and suppliers. The company expects everyone working with us or on our behalf to support and uphold the measures in place to safeguard against modern slavery and human trafficking as follows:

- All employees must read, understand and comply with this policy and management must ensure that regular and adequate training is provided.
- To have a zero-tolerance approach to modern slavery within the company and its supply chains.
- To understand that the prevention, detection and reporting of modern slavery in any part of the company or its supply chains is the responsibility of all those working for us or on our behalf.
- Employees must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- The company will undertake procedural measures to ensure that both existing and potential supply chain partners understand our values and requirements regarding the prevention of modern slavery and human trafficking. Suppliers will be expected to provide evidence of compliance with The Modern Slavery Act.
- It is the company's intention that approved contractors will progressively be required to sign up to our supply chain commitment.

The Managing Director has overall responsibility for ensuring this policy complies with the company's legal and ethical obligations, and that all those under our control comply with it.

Gradon Construction Ltd will continue to review and evolve its processes and procedures with regards to modern slavery and human trafficking with our suppliers and contractors to ensure that potential risks are identified, assessed, mitigated and monitored.

Employees who fail to comply with company policy will be deemed to be in breach of the terms of their contract of employment.

This policy has been approved by Mr. James Grady, Managing Director.

Signed: *J Grady*

Date: 01.10.19

Review Date: 30.09.20