

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT



The Modern Slavery Act of 2015 requires certain businesses to provide disclosure concerning their efforts, if any, to address the issues of slavery and human trafficking in their supply chains. The disclosures are intended to provide clients with the ability to make better, more informed choices about the company which they support.

Section 54 of the Act requires organisations that supply goods or services and have a consolidated global turnover of £36 million per annum or more to prepare a slavery and human trafficking statement for each financial year.

The Company is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations and that of our supply chain. The Company recognises that slavery and human trafficking can occur in many forms. Therefore, throughout this disclosure we use the terms “slavery and human trafficking” to encompass various forms of coerced labour.

Our commitment to human rights is outlined in our Code of Conduct. We have a commitment to improve and implement the Code of Conduct across our supply chain.

The Company takes steps to verify, evaluate and address risks of slavery and human trafficking in our supply chain. The first step in this process is to set clear expectations for our suppliers. Our Code of Conduct states “We do not tolerate forced, debt bonded, indentured labour practices or human trafficking. The Company does not allow harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment..... We expect our suppliers and others to meet these expectations”. Our Code of Conduct also, in turn, provides that “forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used”.

We regularly notify our suppliers of their obligation to comply with our Code of Conduct.

The Company’s Managing Director sets the tone of our ethical culture and holds management accountable for communicating ethics and compliance expectations. Each year our Managing Director communicates with employees and senior managers regarding the importance of ethics and legal compliance. We believe that this “message from the top” along with ethics and compliance training and regular communication throughout the year, helps to create an ethical and legally compliant culture within the business.

Through our Code of Conduct (which contains specific information on slavery and human trafficking) we seek to promote honest and ethical conduct, deter wrongdoing and support compliance with applicable laws and regulations. The principles embodied in our Code of Conduct reflect our policies related to but not limited to slavery, human trafficking, conflicts of interest, non-discrimination, antitrust, anti-bribery, and anti-corruption and protecting our company’s reputation.

The Code of Conduct directs employees to consider short-term and long-term impacts on human rights and the community when making business decisions, and to report potential issues as soon as they are identified.



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J FREELEY LTD

We encourage anyone (including employees, sub-contractors, suppliers and clients) to report in good faith any issues or concerns about potential ethics, human rights, legal or regulatory violations, including improper or unethical business practices such as fraud or bribery.

Signed:

Printed: John Freeley (Director)

Dated: 06 January 2023

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ISO 9001
ISO 14001
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