SLAVERY AND HUMAN TRAFFICKING STATEMENT
FOR THE FINANCIAL YEAR 31 AUGUST 2023

This statement is made on behalf of Reilly JDM Holdings Limited pursuant to section 54(1) of the Modern Slavery Act 2015 ('the Act') and constitutes our slavery and human trafficking statement for the financial year ended 31 August 2023.

OUR STRUCTURE AND BUSINESS

Reilly JDM Holdings Limited is the parent of the John Reilly Group of companies and is made up of separate legal entities providing civil engineering, groundworks and related services. The Group has just under 250 employees and operates in the UK.

The main trading company of the Group is John Reilly Civil Engineering Limited, which this statement also applies to.

OUR SUPPLY CHAINS

Our supply chains include purchasing materials, sub-contracting and other associated trades and services connected with civil engineering and groundworks.

OUR APPROACH AND POLICIES

The Group complies will all laws, regulations and rules relevant to our business.

The Group is committed to maintain and improving systems and processes to avoid complicity in human rights violations related to our own operations and that of our supply chain. The Group 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.

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The Group 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 Group 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 on 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 Group's Board of Directors sets the tone of our ethical culture and holds management accountable for communicating ethics and compliance expectations. Each year our Board of Directors 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 Group'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.

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.

Our policies are reviewed annually and updated as required.

RESPONSIBILITY FOR THE POLICY

The Board of Directors has overall responsibility for ensuring this policy complies with our legal obligation, and that all those under our control comply with it.

Our Anti Slavery Compliance Team which comprises the Financial Director, Construction Director and Commercial Director will work together to ensure that this policy is maintained across all operational areas of the Group in accordance with evolving regulatory required and to ensure that any breaches or concerns are addressed.

DUE DILIGENCE PROCESSES

In order to give effect to our zero-tolerance approach, we have systems in place to ensure that all employees and those in our supply chain implement our policy. These will be kept under review by the Anti Slavery Compliance Team. This year:

- We continue to ensure that prior to starting all new site workers provide a valid CSCS card and a copy of this is put on their file before they are allowed on site;
- We continue to require existing suppliers to confirm they are compliant with Modern Slavery legislation; and

- We continue to review our procurement processes to consider what, if any, adjustments might be made to further reduce the level of risk of slavery and human trafficking in our supply chain.

RISK ASSESSMENT
We consider that the main areas of at risk of Modern Slavery are our workforce and our contracting and procurement processes. These risks are being managed by the Anti Slavery Compliance Team.

SUPPLIER ADHERANCE
We have zero tolerance to slavery and human trafficking and this is communicated to all suppliers, contractors and business partners at the start of our relationship. It is reinforced as appropriate thereafter. We may cease to work with individuals and organisations if they do not comply with our approach.

FURTHER STEPS
We will continue to review our processes to identify any further steps that can be taken to ensure compliance with the Act.

We are considering implementing the following specific measures:

- 100% of individuals involved in recruitment and the supply chain to have completed an Anti Slavery training course; and
- 100% of eligible staff on construction sites to have their CSCS cards or equivalent electronically verified to help us check their right to work in the UK.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 August 2023.

The statement was approved by the board on 1 September 2023 and signed on behalf of the board by Yip Lieu, Director, Reilly JDM Holdings Limited.

This statement is made on behalf of:
Reilly JDM Holdings Limited
John Reilly Civil Engineering Limited