

This statement is made and published in accordance with section 54 of the UK's Modern Slavery Act 2015 and constitutes Quinn (London) Limited's modern slavery and human trafficking statement for the financial year ending 31 May 2023, to mirror current reporting timetable for our annual accounts.

The Directors of Quinn (London) Limited and the parent company, Quinn Investment Holdings (London) Limited approved it on 1st June 2023 and will review and update it annually.

This statement therefore covers the Parent and subsidiary company, named above.

Introduction

Quinn (London) Limited is an award-winning construction company. We have 4 specialist divisions, covering Heritage, Social Housing, Healthcare and new build. Our business operations are primarily focused in London and the surrounding counties.

We are a privately owned Limited company, who are committed to working alongside other organisations, suppliers and sub-contractors who equally support the aim of reducing modern slavery across the UK.

This statement sets out actions we have taken to understand the potential modern slavery risks related to our business, and steps we have put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our group of companies, including:

- Supply chain issues and implementation
- Audits of operational sites, and within our supply chain
- Mirroring legal requirements in supply chain contracts, and employees' contracts
- Non-compliance consequences
- History of disclosure
- Employee training
- Monitoring by Directors and Senior Managers

As part of the construction industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic. We remain committed to preventing slavery and human trafficking in our activities and those of our supply chain. We recognise that our people are integral to what we deliver and fundamentally key to our success.

Policy

We have published a Statement, which has been approved by the Group Board, and signed by the Group Owner and Managing Director, Seamus Quinn. This is updated from time-to-time and can be located either from our own Company's Website¹, or via the UK Government's upload areas for Modern Slavery Statements.²

Our Policy on Modern Slavery needs to be read in conjunction with our Whistleblowing Policy, to ensure that we protect those who help us identify and eliminate Modern Slavery within our business.

¹ <https://www.quinnlondon.co.uk/modern-slavery-statement/>

² <https://modern-slavery-statement-registry.service.gov.uk/>

Definition of Modern Slavery

In order to appreciate how Quinn (London) Limited may tackle the issues of Modern Slavery, we need to have a common understanding of what this is.

Therefore, we have constructed a glossary, to help our staff and suppliers.

Forced labour

Most situations of slavery or human trafficking are covered by International Labour Organization's (ILO) definition of forced labour:

"...all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily."¹

Exploitation

There is no clear legal definition of exploitation but United Nations and European Conventions say that exploitation includes forced labour, servitude and slavery.

One definition is:

"Taking unfair advantage of another person in a work situation, where the element of 'unfairness' is established against a benchmark established in law."²

Debt bondage or bonded labour

This is a specific form of forced labour, in which the element of compulsion is through debt. It is characterised by a creditor-debtor relationship in which the worker is trapped by an unsustainably high debt to their employer.

Human trafficking

The recruitment, transportation, transfer, harbouring or receipt of persons by means of the threat or use of force or other forms of coercion...to achieve the consent of a person having control over another person for the purpose of exploitation.³

Human rights due diligence

"An ongoing risk management process...to prevent, mitigate and account for how [an organisation] addresses its adverse human rights impacts."⁴ - It includes four steps:

- Assessing actual and potential human rights impacts
- Integrating and acting on findings
- Tracking responses
- Communicating how the impacts are addressed.

Decent work

"...productive work under conditions of freedom, equity, security and dignity, in which rights are protected and adequate remuneration and social coverage are provided."⁵

Decent work:

- Is productive and secure
- ensures respect for labour rights
- provides an adequate income
- offers social protection
- includes social dialogue, union freedom, collective bargaining and participation

Due Diligence

We will not tolerate or condone any form of exploitation and will act promptly where any breach of the Act has been identified. We will take appropriate steps against suppliers who do not meet the required standard for example by asking them to take action to improve or terminating the business relationship if the required improvement is not forthcoming. Our Whistleblowing Policy provides a mechanism for our employees to report any breach of our legal obligations, including those contained in the Act.

Supply Chain

Our Supply Chain includes the procurement of trade subcontractors, material and plant suppliers, consultants and other service providers to meet our business requirements. Whilst we have a thorough due diligence process in place for managing both new and existing supply chain relationships, we continue to regularly review these to ensure that the intention and requirements of the act are addressed. Working with our supply chain partners we ask that they provide us with the assurance that, modern slavery is understood and not present in their company and wider supply chain. We want to make sure that safe and fair working conditions are provided and we require that those in our supply chain have policies, procedures, practices and contracts within their organisations and with their own suppliers to equally reflect this.

Quinn (London) Limited regularly reviews our trading partners as part of our supply chain management, focusing closely on those we consider to be at the greatest risk, including suppliers; who operate by employing casual or temporary labour, manufacture or trade in raw materials, particularly outside the UK / EU. They need to demonstrate to us, full compliance with our policy and this statement.

We have reviewed our standard purchase orders that are used to engage with our supply chain to assess and manage any risk, as far as is reasonably practicable. To support our approach further all of our subcontract orders and purchase orders have an appropriate paragraph included as standard, regarding the Modern Slavery Act.

Quinn (London) Limited has a database, which facilitates both the on-boarding of potential new supply chain partners and the review for existing ones. We link our prequalification questions to those of PAS 91, accredited through CHAS Elite, Safe Contractor and Construction line.

By using CHAS, CHAS Elie, Safe Contractor, and Constructionline as our preferred data validators, we can capture the provisions for modern slavery within their established accreditation processes.

Where our supply chain does not subscribe to CHAS or Constructionline:

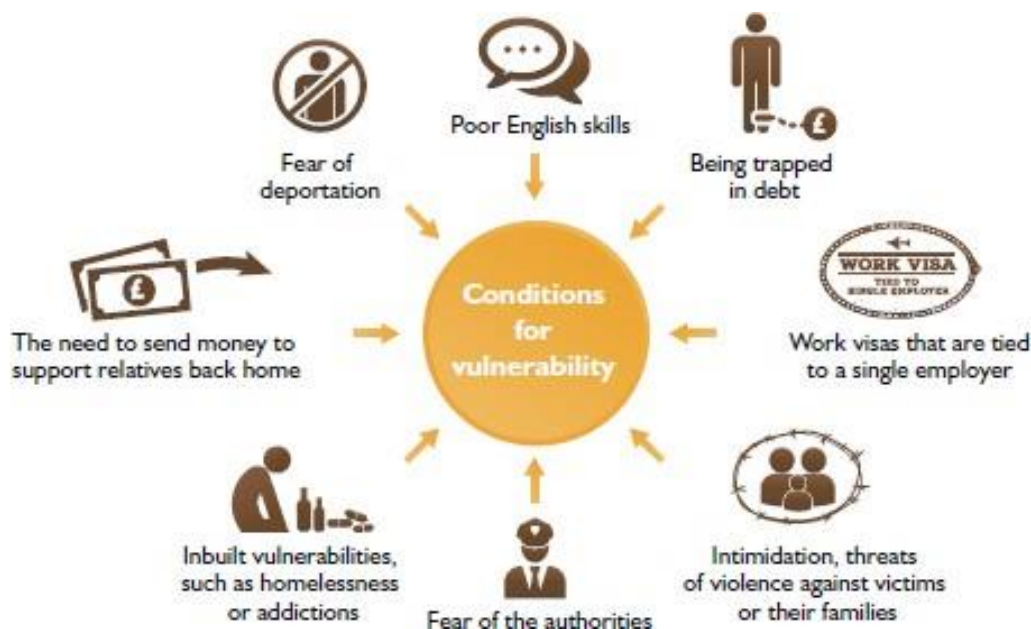
- We will use our existing supply chain questionnaires within our ISO9001:2015 quality management system, to interrogate their awareness and compliance, and carry our due diligence where a risk is perceived.

Areas of Risk

We have carried out a risk assessment of our operations and consider that risk of Modern Slavery is present in the ranked order, as follows.

1. Small subcontractors, who are engaged on work packages, which are imbalanced to their number of directly employed employees
2. When work is further subcontracted, as control may be lost
3. Temporary labour sources by un-registered labour agencies
4. Staff engaged locally to each project, through labour agencies
5. Local Authorities in advancement of their own local labour initiatives
6. Materials suppliers, who are most likely to have a larger turnover than Quinn (London) Limited
7. Directly employed staff

Therefore, our action plan has been set up to deal with these on an on-going basis.



Monitoring Legal Requirements

As part of our ongoing duty to identify and mitigate risk we have in place systems and processes to:

- Regularly monitor labour and payroll
- Include the Act requirements as part of our procurement process clear set out our expectations
- Provide appropriate training
- Build strong relationships with our supply chain and make clear the Group's expectations as to their conduct
- Protect and support any whistle blowers
- Identify and assess potential risk areas in our supply chains; and
- Monitor potential risk areas in our supply chains and put in place actions to mitigate those risks

Our central HR and procurement functions assist us to have visibility and a better understanding of the risk areas.

Validation Options

- CSCS Card for operatives on sites
- UK Passport and/or drivers license
- National Insurance Number Card
- Work Permit
- UK Residency Permit
- Language skills

Continuous Improvement

During our current financial year ending 1st June 2024, we continue to monitor the effectiveness of our actions against modern slavery and human trafficking and review the risks within our own business and across our supply chain. We continue to provide further guidance and support to all employees and Supply Chain Partners to raise awareness within our industry.

Actions to ensure continuous improvement include:

- All staff to complete an updated training module on Modern Slavery by 1st June 2024
- Review our existing Supply Chain and ensure that they sign up to our new and revised
- Supply Agreement by 31 December 2024
- Review orders placed and sizes of company, to highlight potential for risks
- Continue to rely on accreditation systems (CHAS and Constructionline)

Failure to comply

Quinn (London) Limited's procurement orders formally identify consequence for breaches of legal requirements, to all our supply chain. Where a breach occurs, contracts will be set up with an alternative supplier, prior to formally ending it with the company in breach.

Employees are vetted during our pre-engagement process, by our HR team. In the event that a non-compliance is identified, potential candidates will be excluded from the recruitment process and Quinn (London) Limited will inform relevant authorities of the breach identified.

Employees are made aware within our HR handbook and their Terms and Conditions of employment of the company's and their own responsibilities. Employees who fail to apply the Terms and Conditions of employment and/or law, or disregard it, will be dealt with under our disciplinary system, which ultimately could lead to their dismissal.

2022/2023 Incidents

- We did not detect, nor were we made aware of, any breaches on Modern Slavery
- There were no Statutory Disclosures during the year

Employee Training

To ensure a good level of understanding of the risks of modern slavery and human trafficking in our business and supply chain, we will endeavour to provide relevant training to members of staff and a general briefing to all employees.

We are committed to:

- Ensure that all UK workers are in receipt of the London Living Wage or National Minimum wage
- To ensure that relevant immigration checks or work permits checks occur
- Ensure that labour sourcing, recruitment and worker placement processes are under control of trusted and competent staff
- Not to use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee
- Provide appropriate information, instruction, resources and training necessary to educate the workforce and supervisors
- Positively encourage workers to report cases of exploitation, provide the means to do so, and protect whistle-blowers and act upon reports appropriately
- Encourage the reporting of suspicious hidden worker exploitation to the Gangmasters Licencing Authority and Police
- Reviewing our supply chain to identify risk areas and suitable due diligence control measures
- Implement a pre-qualification process for both suppliers and subcontractors, which includes obligations and assurances that they comply with the requirements of the Act
- Not knowingly support or deal with any business involved in slavery or human trafficking
- To train staff, on an ongoing basis in the requirements of the Act, and its intentions, appropriate to their role within the Company
- Nominating a Parent Company/Main Board Director, to oversee implementation and on-going monitoring

Director Responsible

Our Finance Director, Imran Karim, is the main board director with formal responsibility for the application and monitoring of our duties under the Modern Slavery Act.

A handwritten signature in black ink, appearing to be "Imran Karim", written over a horizontal line.

Signed
Seamus Quinn
7th June 2023