Introduction

Amalgamated Construction Ltd (AmcoGiffen) is fully committed to the prevention of Modern Slavery and Human Trafficking and will not tolerate or condone any such identified act within any aspect of our business activities.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015, it sets out the activities undertaken by the Company in respect of the prevention of Modern Slavery and Human Trafficking and constitutes the Company's annual Modern Slavery statement for the financial period 1st October 2021 to 30th September 2022.

Organisational Structure

AmcoGiffen and its subsidiaries provide a diverse range of specialist construction and engineering services in support of the creation and maintenance of infrastructure assets for both public and private sector customers in the Infrastructure Sector.

Our work is conducted solely in the United Kingdom and delivered by a directly employed workforce, supplemented where necessary by temporary workers supplied by reputable recruitment partners, all of whom are fully eligible to work within the United Kingdom.

AmcoGiffen recruits either directly or via a limited number of reputable recruitment partners, who are required to successfully complete our supply chain due diligence process, prior to being accepted as a recruitment partner.

AmcoGiffen believes that no worker should pay for a job. The cost of the recruitment of ANY worker engaged by AmcoGiffen will be borne by AmcoGiffen not the worker and, as part of our due diligence and risk identification processes, we will ensure that our supply chain and recruitment partners also adhere to this principle.

Supply Chain

Given the nature of our organisational structure, our model of directly employed work delivery and our use of a UK based Supply Chain, we consider that any exposure to risk of Modern Slavery or Human Trafficking is extremely low and that should any risk exist it is most likely to be within the extended Supply Chain.

We work closely with the Tier 1 providers of our Supply Chain in the identification of such risks to ensure they are addressed in an appropriate manner.

Modern Slavery Policy

AmcoGiffen has implemented a comprehensive policy in respect of Modern Slavery and Human Trafficking.

This policy and supporting procedures details our business approach to the prevention of Modern Slavery and Human Trafficking, along with the processes used to support and deliver our commitment. This policy and commitment has been communicated to our colleagues and Tier 1 Supply Chain partners for their information and action.

We operate a risk based approach to the identification of Modern Slavery and Human Trafficking, the principle of which is based on the location of the product or service, industry sector, supplier relationships and existing data held, supported by additional information and guidance obtained from, but not limited to, sources such as the Global Slavery Index, Corruption Perceptions Index and US Department of Labour Lists of Goods and Suppliers.

Due Diligence and Identification of Risk

AmcoGiffen's policy of direct employment is supported by robust processes which ensure that an individual's identity is confirmed and they have a legitimate right to work in the United Kingdom. This policy and the right to work checks undertaken by our staff significantly reduces the risk of directly employing forced labour or those who may be subject to human trafficking.

Where AmcoGiffen do utilise labour only sub-contractors we have introduced due diligence checks to ensure that, as a minimum, labour providers comply with our commitment to the Prevention of Modern Slavery and their processes for recruitment contain no illegal labour practices.

Notwithstanding that AmcoGiffen's Supply Chain is primarily UK based, we have instigated a risk assessment of supply chain activities to identify and prioritise any areas which may pose a risk of Modern Slavery.

Our activities during 2021/22

Our activities during 2021/22 were still somewhat restricted due to the effects on the business resulting from the global COVID-19 pandemic. However, our commitment to and activities supporting the prevention of modern slavery remain a key priority for AmcoGiffen.

We have:

- Previously completed a data analysis in respect of identified high risk suppliers which has enabled us to monitor the identified high risk suppliers.
- Undertaken a defined programme of audits in relation to identified key high risk suppliers.
- Continued to review our procurement and supply chain and their processes, to understand the activities they undertake, to ensure that Modern Slavery and Human Trafficking is not taking place within our supply chain.
- Introduced an AmcoGiffen Supply Chain Anti-Slavery and Ethical Procurement Policy
- Incorporated our Modern Slavery requirements into our supplier reviews and vendor assessment process for new suppliers and re-appraisal for existing members of the supply chain. This ensures that all existing suppliers renew their vendor assessment after a period of three years. This has meant that all new suppliers are immediately included and that any remaining Tier 2 and Tier 3 elements of the existing AmcoGiffen supply chain were captured by the latter part of 2019 at the latest.

Our objectives for the financial year 2022/23 include:

- Undertaking a further review of our existing supply chain to ensure that any potential new or existing suppliers have not changed their status in terms of "risk".
- Engaging with our key strategic suppliers and industry bodies to engage with their supply chains to discuss and understand capability, best practice and learning on Modern Slavery to continuously improve our approach to Modern Slavery.

Communication and Training

Our commitment to the prevention of Modern Slavery and Human Trafficking emanates directly from our Board of Directors. Their leadership and commitment to this important social issue has been clearly communicated both internally to colleagues and externally to subcontractors and Tier 1 supply chain partners.

All colleagues receive training in relation to Modern Slavery appropriate to their position and their involvement/responsibility in the engagement of workers and/or for dealing with supply chain matters.

Commitment

The Board of Directors have reviewed, accept and fully support this statement and formally approved it on 20th February 2023.

We acknowledge that we are still in the early stages of a long term strategy and our approach to the Prevention of Modern Slavery and Human Trafficking will undoubtedly evolve year on year.

We will utilise our annual statements to publicly reaffirm our continued commitment and to communicate this evolution, including the steps we have taken and will continue to take, to deal with this morally and socially important issue.



John Booth
Managing Director
Amalgamated Construction Ltd (AmcoGiffen) 20th February 2023