Modern Slavery Statement

This statement is published in accordance with the Modern Slavery Act 2015 and sets out the steps being taken to prevent modern slavery and human trafficking in our business and supply chain in the financial year of 01 September 2023 to 31 August 2024.

Introduction

We all have a responsibility to take a robust approach to the risks of modern slavery and human trafficking, however small, in our businesses and in the wider supply chain. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities.

Our Business and Supply Chain

Joseph Gallagher are a leading specialist Tunnelling and Civil Engineering subcontractor domiciled in the UK. Joseph Gallagher Group comprises of Joseph Gallagher Ltd (JGL), Specialist Plant Associates (SPA) and NRC Plant in the UK. In addition, JGL has international operations in the Middle East.

To date we have not had any incidents of suspected or actual modern slavery reported within our business or supply chain. However, our high-risk activities involve the recruitment and supply of blue-collar workers, many of whom are not British. It is known and documented that modern slavery presents a particular risk in this demographic within our industry.

Our Policies in relation to Modern Slavery

Anti-Slavery policy: We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Whistleblowing: We encourage all our workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chain of our organisation. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

LIFE: Our safety culture 'Living Incident Free Everyday' sets out the values and behaviours under which our employees and subcontractors are expected to operate. Our values of Teamwork, Respect, Integrity, Excellence and Determination are discussed with everyone working on our sites and we actively encourage people to call out issues without reprisal and to take responsibility for the wellbeing of their fellow workers.

Recruitment: The majority of our recruitment is undertaken directly with individuals required to apply directly to our business. We use only specified, reputable employment agencies to source labour when it is necessary to supplement our direct recruitment procedures. We do not engage with gangs, insisting that all individuals sign up to terms either directly or via our vetted subcontract providers. No one individual will be paid with a responsibility to pay their own gang.

Adherence to our values and ethics

We have a zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a rigorous supply chain compliance programme. To be considered for work for Joseph Gallagher Limited and/or its subsidiaries, a pre-qualification questionnaire must be completed and returned with all appropriate documents. By signing this document, the contractor or supplier

must agree to comply with and work under Joseph Gallagher Ltd. As such, contractors or supplies must adhere to Joseph Gallagher Ltd.'s Integrated Management System, which is accredited and complies with all HSEQ regulations and legislation, including but not limited to the Modern Slavery Act 2015.

Due Diligence

As part of our initiative to identify and mitigate risk, JGL are signatories of the Gangmasters and Labour Abuse Authority's Construction Protocol and active participants in the Tideway Modern Slavery working group, sharing information and learnings across the industry.

All new joiners will have one of the following:

- A Direct PAYE contract of employment with Joseph Gallagher Ltd, SPA or NRC.
- A contract with our labour supply subcontractor if they are self-employed CIS. In which case they will be vetted by our sole subcontractor engaged for this purpose.
- A contract with a verified employment agency.

All individuals are required to provide their own email address, telephone number, bank account details and passport or biometric residence permit. Face-to-face verification checks on original right to work documents are undertaken on site for all workers regardless of method of engagement, as part of their site induction.

All staff, including temporary workers, are paid at least the legal minimum wage. No deductions are made for accommodation, food or to repay any supposed debt other than debts notified by government agencies. Working hours are monitored.

Performance Indicators

We have reviewed our key performance indicators (KPIs) for 2021. Following this review, we plan to carry out key steps to ensure that there is no slavery or human trafficking in our supply chains.

- Require Payroll, Human Resources, Recruitment and Labour Management staff to complete the 1-day 'Tackling Modern Slavery in the Construction Sector' workshop with Stronger Together.
- Require Project Managers, Commercial staff and Leaders of NRC and SPA to undertake in house modern slavery training.
- Continue to develop and deliver an awareness raising campaign to be delivered to all workers across the business.
- Continue to develop our Toolbox talk for site workers, focusing on individual rights, the signs to look for and ways to report issues.
- Continue the review of our system for supply chain engagement, to evaluate and mitigate any risk surrounding the evaluation of new suppliers.
- Carry out a modern slavery audit of our existing Supply chain and mitigate any risks.
- Incorporate reporting of suspected modern slavery into our new safety observation reporting software which is under development.
- Undertake a payroll audit each quarter to check for duplicate bank accounts, duplicate emergency contact details or addresses, with a focus on high-risk demographics.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, from 2022 we will require procurement, payroll, HR, project managers, members of the commercial team and labour management professionals to complete training with respect to tackling modern slavery.

Our modern slavery training will utilise materials from the supply chain sustainability school and stronger together and will cover:

- how modern slavery occurs in the construction sector: the potential risks, impacts and the business case for tackling it
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available
- how to identify the signs of slavery and human trafficking
- what initial steps should be taken if slavery or human trafficking is suspected
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative.

Awareness-raising programme

As well as training staff, we are raising awareness of modern slavery issues by delivering information directly to workers across our business and supply chain, sending out fliers, putting up posters across our premises, delivering toolbox talks and circulating a series of emails and news stories to all workers. The various methods of communication explain:

- how employers can identify and prevent slavery and human trafficking
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Our Supply Chain

Our supply chain comprises of subcontractor organisations who engage subcontract labour, carry out works and services on our construction sites and source materials and manufacture products. We are committed to ensuring that slavery and human trafficking plays no part in our supply chain or any part of our business. As part of our initiative to identify and mitigate risk:

- We have centralised our procurement activities and the use of our in-house procurement and finance system requires all registering of new vendors, purchasing and payment of invoices to be managed via our centralised procurement and finance teams. We do not utilise a company credit card system or make cash payments. Therefore, supply chain payment is centralised, transparent and controlled.
- Where possible we build long standing relationships with our suppliers and subcontractors and make clear our expectations of business behaviour.
- Our subcontractors will be audited in line with our KPIs to minimise any risk with respect to modern slavery.

This statement has been approved by the Board of Directors of the Joseph Gallagher Group for 2023.



Steve Harvey
C E O
August 2023