

## SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT (The Modern Slavery Act 2015)

The Directors of Clegg Group Ltd 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.

### DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk:

- Our sites and working environments will be managed by Clegg employed personnel to ensure optimum control of the work environment and who works within it;
- Where practicable we will continue to build long standing relationships with contractors and suppliers and make clear our expectations of business behaviour;
- With regards to national or international supply chains, our point contact is preferably with a UK company or supplier and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links within the supply chain.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.
- As part of our initiative to identify and mitigate risk we monitor ethical standards across the business on a regular basis both internally and via external third party audits. Sites undergo unannounced inspections by our own HSEQ Department and external health and safety consultants. Both organisations will report back on any issues relating to social and human behaviour common with slavery and human trafficking.

### CONTRACTOR AND SUPPLIER ADHERENCE TO OUR VALUES AND EFFECTIVENESS

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. The supply chain security and integrity is a crucial component of the business model. Robust technical and traceability systems ensure that our contractors and suppliers are responsibly sourced from Organisations/suppliers whose values are aligned with our own. As a company we use Labour Providers and contractors to supply a large percentage of our workforce. Each Labour Provider and contractor is audited against the construction industry standard for the supply of labour (workforce) by trained staff that always monitors assess and mitigate the potential risk areas in our supply chains.

### TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

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 current financial year.

Signed on behalf of Clegg Group Limited

Date 02 January 2019



Keith Anderson  
Group Commercial  
& Financial Director



Simon Blackburn  
Group Director



Stephen Giltrap  
Group Director