

Scope

This document establishes the Modern Slavery Policy for 'the Company' and 'Company' refer to the legal entities, Emico Limited, their subsidiaries or group services. References in this policy to 'our people' are to employees of Emico across the Group.

Purpose

Emico recognises that slavery and human trafficking are significant human rights issues and are committed to taking the required steps to mitigate the risk of these occurring within our business and our supply chain.

Emico has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all of our business dealings and to implementing effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or supply chain.

The Emico Modern Slavery Policy will be brought to the attention of all our people. This Policy does not form part of our people's contract of employment and may be amended by the Company.

The policy will be reviewed annually to ensure it is fit for purpose.

Introduction

As an independent contracting business operating within the UK, we recognise that the groups of people who could potentially be affected by slavery and/or human trafficking issues are our directly employed workforce, agency workers carrying out work on our behalf, subcontract operatives working on our projects and the workforce of our supply chain who supply materials to our business.

Application

Emico has policies and processes in place to ensure that we are conducting business in an ethical and transparent manner.

The steps that we take to mitigate risks in relation to each of these areas are as follows:

Permanently Employed Workforce

- We verify that all permanent employees have the right to work in the UK prior to any formal offer of employment is made. Please refer to the Company's Employee Selection & Competence Policy or the Recruitment Process
- We make all employees aware of their working hours, leave and absence entitlements and other employment benefits via their terms and conditions of employment
- We prohibit the use of forced labour and provide training on modern slavery which is available to all employees. This is captured during the induction process and regular refresher training sessions organised for existing staff. Generally, our E-Learning platform is utilised for this.

Agency Workers

- We engage agency workers who are provided by our vetted suppliers on our Emico Agency PSL (Preferred Supplier List)
- A Service Level Agreement (SLA) is reviewed and signed where Emico require all Agency PSL suppliers to:
 - Confirm that their agency workers have the right to work in the UK
 - Confirm they do not charge their workers a work finding fee
 - To have procedures in place which mitigate the risk of recruiting forced or compulsory labour.

Subcontractors

- We require subcontractors to provide evidence that they verify their employees have the right to work in the UK
- We consider subcontractors approaches to employee rights and any breaches of human rights related legislation during our selection process
- We ask all site-based operatives to provide evidence of the necessary cards to attend work on a project i.e. ECS or CSCS
- We require all subcontractors who purchase materials for use on our sites to consider the risk of modern supply in their supply chain.

Suppliers

- We procure the majority of our directly sourced materials from UK based organisations that are required to comply with UK law in respect of forced labour
- Where materials are directly sourced from outside of the UK we consider the risk of slavery and human trafficking as part of our selection process. Those suppliers are vetted accordingly.

Due diligence is undertaken on all the above areas prior to allowing them to operate within the Company or supply materials.

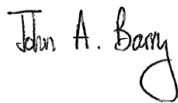
Measuring Effectiveness

In order to monitor the effectiveness of the steps we have taken to stop slavery and trafficking taking place in our business and supply chains, we will use the following performance indicators for the financial year ahead:

- All employees will have completed the relevant training, as referenced above.
- We have issued our Modern Slavery Policy to our workforce through our induction process and the Company's Integrated Management System (IMS). This shows we clearly communicate our stance in relation to modern slavery.
- We will establish a process to gain a better oversight of our direct supply chain and consider how best to risk assess, carry out due diligence and communicate with these suppliers in relation to modern slavery issues. We will consider whether it is appropriate to raise specific questions in relation to slavery and trafficking with these suppliers.
- As we develop our risk assessment and due diligence processes, we will assess and consider the appropriateness of developing further measures, where we assess that there may be a heightened risk of slavery and trafficking within those organisations. We will take appropriate measures to encourage and persuade them to adopt their own measures to minimise the risks of slavery and trafficking within their own organisations and the supply chain beyond.

Raising Concerns

All individuals, regardless of employment status, can use the Emico Whistleblowing Policy to confidentially raise issues or concerns in respect of any aspect of ethics or compliance, including slavery and/or human trafficking.



Signed:

Name: John Barry

Job title: Group Managing Director

Date: March 2019