

Purpose

Alandale Group of Companies (“The Group”) is formed of Alandale Logistics Ltd, Alandale Plant & Scaffolding Alandale Security and Alandale Northern Ltd.

Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment.

This Statement sets out The Group’s actions to understand all potential modern slavery risks related to its businesses and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our businesses and our supply chains.

As part of construction industry, The Group recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The Group is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Responsibility

Responsibility for the Group’s anti-slavery initiatives is as follows;

- Policies: Group Head of Human Resources
- Risk assessments: Group Director of QHSE
- Investigations/due diligence: The Group Head of Human Resources is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- Training: Training is delivered by the Human Resources Department and QHSE Department to ensure our employees, workers and subcontractors better understand and respond to the identified slavery and human trafficking risks.

Relevant policies

The Group operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- Whistleblowing policy: The Group encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Group. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

The Group's whistleblowing procedure is designed to make it easy for all workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact the Human Resources Department in confidence and private and where preferred, anonymously.

- Employee code of conduct: The Group's code makes clear to employees the actions and behaviour expected of them when representing the Group. The Group strives to maintain the highest

standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Supply chain code of conduct: The Group is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Group works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Group's supplier code of conduct will lead to the termination of the business relationship.

- **Recruitment/Agency workers' policy:** The Group uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Any other policies relevant to the Group's business or sector:** The Group has other relevant policies such as Corporate Social Responsibility Policy, Young Persons Policy, Equality and Diversity Policy and Ethical Policy. The Modern Slavery Policy must be woven into the fabric of all these other relevant policy, in that they are all to be interpreted within the spirit and intent of this policy. Where there is any inconsistencies or ambiguity between this policy and any other, this policy will prevail.

Due diligence

The Group undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Group's due diligence and reviews include;

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through [third party auditor] and requiring them to implement action;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular;
- Where available, using details of ethical supplier database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.
- At least one comprehensive annual audit of The Group's supply chain with quarterly ad hoc physical and document spot checks of the workforce to ensure ongoing compliance.

Performance indicators

The Group has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Group is:

- requiring all senior managers, supply chain managers and HR professionals to undertake training on modern slavery.
- updating its system for supply chain verification, whereby the Group evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains whereby the Group will re-evaluate all existing suppliers in light of the Modern Slavery Act 2015.

Training

The Group requires senior managers, supply chain managers and HR professionals within the Group to complete training on modern slavery as a module within the Group's wider human rights/ethics/ethical trade training programme.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- 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 the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the Group should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Group's supply chains.

Awareness-raising programme

As well as training staff, the Group has raised awareness of modern slavery issues by circulating a series of emails to staff and publishing articles in the staff newsletters.

The information circulated explain to staff:

- the basic principles of the Modern Slavery Act 2015;

- 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 the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

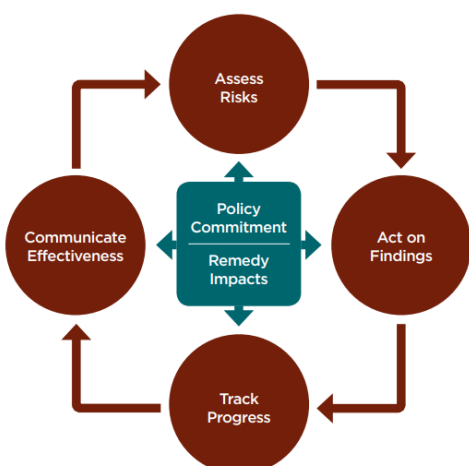
Employers Pay Principle

The Group is committed to the Employer Pays Principle that no worker should pay for a job – the costs of recruitment should be borne not by the worker but by the employer. Our commitment which is supported by our procedures ensures that:

- Migrant workers shall not be required to pay for their employment.
- The costs and fees associated with recruitment, travel and processing of migrant workers from their home community to the workplace, including through to return when the relocation is not permanent, shall be covered by the employer, where applicable.
- The employer should pay the costs of recruitment directly to the extent possible. When not possible, or where the migrant worker is legally required to pay a fee or cost directly, the migrant worker shall be reimbursed by the employer as soon as practicable upon discovery.
- The Group will explain how this policy applies to our workforce (employees, agency and contract workers) as well as our expectations of business partners and supply chain.

Six Steps to Responsible Recruitment

Implementing the Employer Pays Principle



Employer Pays Principle

No worker should pay for a job – the costs of recruitment should be borne not by the worker but by the employer.

Board approval

This statement has been approved by the Group's board of members, who will review and update it annually.



Perry Morgan
Group Chairman

Date: 1 September 2023