

SCOPE

This document establishes the Modern Slavery Act Policy for Galliford Try Employment Limited. References in this policy to the 'Company' are to Galliford Try Employment Limited. References in this policy to 'our people' are to employees of Galliford Try Employment Limited.

PURPOSE

At Galliford Try Employment Limited we recognise that slavery and human trafficking are significant human rights issues and are committed to taking appropriate and proportionate steps to mitigate the risk of these occurring within our business and our supply chain.

The HR Director is responsible for the content of this policy, our approach is overseen by the Ethics and Compliance Committee and overall accountability for compliance rests with the Executive Board.

The Galliford Try Employment Limited Modern Slavery Act Policy will be brought to the attention of all our people. The policy does not form part of our people's contract of employment and may be amended by the Company from time to time. It will be reviewed annually.

GENERAL DATA PROTECTION REGULATION

Be aware that whenever we are collecting, using, retaining, transferring or disposing of any information about a person ("processing of personal data") in connection with the subject matter of this policy we have numerous obligations under the General Data Protection Regulations (GDPR). Any failure to comply with GDPR can have serious results including breach of the person's rights and financial penalties for the Company. You must not proceed with any processing of personal data unless you have first read and complied with the Group Data Protection Policy, reference HR-POL-004, which can be found on the HR policy page of Galileo. If you have any questions about GDPR compliance please contact the Group Chief Information Officer, the Head of Information Security and Compliance or Legal Services.

MODERN SLAVERY ACT POLICY

As a construction business operating within the UK, the key areas of our operation that could be affected by slavery and/or human trafficking are our directly hired employees, agency workers carrying out work on our behalf, subcontractor operatives working on our sites and the workforce of our supply chain who supply materials to our business.

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

Employees

- We verify that all direct employees have the right to work in the UK prior to any formal offer of employment being made
- We make all employees aware of their working hours, leave and absence entitlements and other employment benefits via their contract of employment
- We prohibit the use of forced labour in our Code of Conduct (Doing the right thing) and make training on modern slavery available to all employees

Agency Workers

- We aim to only engage agency workers who are provided by suppliers on our Preferred Supplier List
- We require all Preferred Supplier List suppliers to:
 - Confirm that their agency workers have the right to work in the UK
 - Confirm they do not charge workers a work finding fee
 - Have procedures in place to minimise the risk of recruiting forced or compulsory labour

Subcontractors

- We required subcontractors to ensure 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 their CSCS cards
- We want all subcontractors who purchase materials for use on our sites to consider the risk of modern slavery 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 on 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

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

Useful Contacts

HR Hub by telephone on 01455 231828 or by email to HR.Hub@gallifordtry.co.uk

Local HR contacts for advice and guidance