

1.0 Introduction

This statement sets out Rainton Construction Limited (RCL) actions to understand all potential modern slavery risks related to the Company and put in place steps to ensure that there is no slavery or human trafficking in its own Company its supply chains. This statement relates to actions and activities from 1st January 2021 to 31st December 2021.

As part of the Construction and Demolition sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

We are committed to preventing slavery and human trafficking in our activities and ensuring that our supply chains are free from slavery and human trafficking.

We are committed to reporting publicly about Company performance each year.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for RCL.

2.0 Scope

Rainton Construction Limited:

The Provision of Bridge Refurbishment including Reinforced Concrete Structures and Associated Infrastructure Works, Road Construction and Resurfacing.

National Highways Sector Schemes for Quality Management in Highway Works Scheme 16 for Management of The Laying of Asphalt Mixes – Machine Lay and Hand Lay (With Normative Document BS 594987: 2010 Asphalt For Roads and Other Paved Areas – Specification For Transport, Laying, Compaction and Type Testing Protocols).

3.0 Relevant Policies

We have made several commitments in our policies to help us to address the risk of slavery and human trafficking occurring in our operations or supply chains. The following policies are the ones that we consider give us strength in avoiding modern slavery or human trafficking under the Act:

- Corporate Social Responsibility
- Equality and Diversity
- Anti-Bribery and Corruption
- Code of Conduct
- Procurement.

4.0 Supply Chain

We are committed to ensuring no modern slavery or human trafficking in the supply chain (including sub-contractors, consultants, materials suppliers, distributors, and labour agencies) or any part of the business. We will take a zero-tolerance approach to slavery and human trafficking.

5.0 Assurance Process

To identify and mitigate slavery and human trafficking risk, we undertake due diligence when considering taking on new supply chain partners and regularly review our existing list. Due diligence and reviews have included:

- Validating all of our supply chain partners against the PAS91 standard as a minimum through our Buyer Service Agreement. Our supply chain partners must be registered with Constructionline and achieve verified status at Silver accreditation to ensure that their business is fully compliant following our requirements (including details of their action on modern slavery). However, supply chain partners with an annual turnover below £350K and less than five employees would only need to complete the Bronze Accreditation question set
- Successfully undertaken surveillance audits to our ISO 45001, ISO 900 and, ISO 14001 certifications
- Our standard form contracts include an obligation to comply with our SHEQ Terms and Conditions, containing obligations relating to modern slavery (section 22. Sustainable Procurement).

6.0 Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the supply chain and within the Company, we will provide training for those involved in procurement and/or with responsibility for supply chain management and Human Resource (HR).

7.0 Future Development

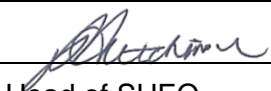

- Conducting compliance audits with our key labour agencies, inclusive of modern slavery arrangements
- Increasing awareness among our employees to ensure they can identify the signs of modern slavery and understand how to report it
- Procure and launch a dedicated modern slavery e-learning programme in 2022. The module will cover topics including identifying the warning signs of modern slavery and what to do if you are concerned.

The module will include an assessment undertaken by any new starter and completed every two years after that.

8.0 Covid-19

The challenges presented by the coronavirus pandemic mean that some business activities concerning training and future development have been rolled over from the previous period.

Reduced staff capacity and remote working have had a significant business impact.

Revision and Approval		
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Position:	Head of SHEQ	Managing Director
Date:	31/12/2021	31/12/2021