

1.0 Introduction

This statement sets out Rainton Construction Limited (RCL) actions to understand all potential modern slavery risks related to the Company and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own Company and its supply chains. This statement relates to actions and activities during the calendar year 1st January 2020 to 31st December 2020.

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 absolutely committed to preventing slavery and human trafficking in its activities, and to ensuring that its 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 a number of 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 that there is no modern slavery or human trafficking in the supply chain (including sub-contractors, consultants, materials suppliers, distributors, and labour agencies) or in any part of the business and we will take a zero-tolerance approach to slavery and human trafficking.

5.0 Assurance Process

In an effort to identify and mitigate risk in respect of slavery and human trafficking, we undertake due diligence when considering taking on new supply chain partners, and regularly reviews our existing list. Due diligence and reviews have included:

- Validating all of our supply chain partners against the PAS91 standard as a minimum by way of 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 in accordance with our requirements (including details of their action on modern slavery), however, supply chain partners with an annual turnover below £350K and less than 5 employees would only need to complete the Bronze Accreditation question set
- Successfully undertaken a transfer audit to re-certify ISO 9001, ISO 14001 and NHSS Scheme 16 and carried out the transition for OHSAS 18001 to move to ISO 45001
- 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).

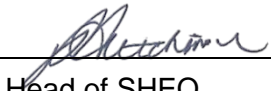

6.0 Training

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 2021. 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 and will be undertaken by any new starter and will be completed every two years thereafter.

Revision and Approval		
	Authors	Approver
Name:	Paul Hutchinson	David Elliott
Signature:		
Position:	Head of SHEQ	Managing Director
Date:	31/12/2020	31/12/2020