

# Luddon Construction Limited

## Modern Slavery and Human Trafficking Statement



### Introduction from the Managing Director

We are committed to improving our practices to combat slavery and human trafficking.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

### Organisation Structure

We are a provider of Groundworks, Infrastructure, Building and Refurbishment, Surfacing and Drainage services covering a wide spectrum of sectors including the challenging environments of petrochemical, rail, energy and utilities. We have over 400 employees and operate in the UK only.

Our business

Our business is organised into six contracts divisions, including:

- Civil Engineering.
- Building.
- Projects.
- Petrochemical.
- Surfacing.
- Drainage & Small Works.

### Our Supply Chains

Our supply chains include:

- Sub-contractors.
- Recruitment agencies.
- Material suppliers.
- Plant & equipment suppliers.
- Professional services.

### Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We undertake all relevant pre-employment checks prior to staff being employed. We carry out fair and transparent recruitment processes and ensure our recruitment agencies comply with these requirements in the provision of agency staff.

### Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

### Supplier Adherence to Our Value and Ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics we have in place a supply chain compliance programme. This consists of a pre-qualification process which requires our suppliers to demonstrate commitment to combatting modern slavery and human trafficking.

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### Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant staff.

### Our Effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Supply chain commitment to tackling modern slavery and human trafficking
- Reported instances of modern slavery and human trafficking within our supply chain

### Further Steps

We shall undertake annual review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains with a view to identifying further steps that we can take.

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

Signed

Date: 1st February 2018

A handwritten signature in blue ink, appearing to read 'CM Frize'.

CM Frize  
Managing Director