

# Modern Anti-Slavery (Act 2015) Policy

## Introduction

This Policy sets out Thomas Johnstone Limited's (TJL) actions to put in place progressive steps to ensure that there is no slavery or human trafficking in its own business or within its supply chain.

## Subcontract and Supply Chains

This Policy covers all TJL activities and requires that all who have a business relationship with TJL will act at all times in a way consistent with this anti-slavery policy.

TJL operations are only in construction, within Great Britain from its base in Scotland and this Policy reflects that. As part of the companies due diligence processes into slavery and human trafficking, the supply chain approval process will incorporate a review of the controls undertaken by the supplier. In particular, imported goods from sources from outside the UK and EU are potentially more at risk for slavery or human trafficking issues.

The level of management control required for these sources will be continually and progressively monitored.

## Responsibility

The Directors shall take responsibility and will liaise with all departments to ensure that any potential risks are identified and followed up with relevant investigations and due diligence to identify any activities involving modern slavery and human trafficking.

The Directors will also ensure that employees are given adequate training and guidance is available on the issue of modern slavery so that everyone understands and complies with the intent of this policy to prevent modern slavery and human trafficking.

## Relevant Policies and Practices

TJL's Policy on Whistleblowing encourages all its workers, customers and other business partners to report any concerns related to the activities of the organisation or its supply chain. The Company's Whistleblowing procedure is intended to make it easy for employees to make disclosures, without fear of retaliation. We manage our own recruitment activities including carrying out appropriate background checks and will only use reputable employment agencies to source our own labour.

## Awareness & Training

As well as training staff, TJL will raise general awareness of modern slavery issues at staff seminars, as well as this Policy being on the company intranet. We expect employees to refer to this policy and understand what is required of them in relation to the prevention of modern slavery. This Policy on Modern Slavery will be communicated to all subcontractors and suppliers and included in our Subcontractor and Supplier approval Questionnaire processes.

TJL will not procure from or contract with any business knowingly involved in slavery or human trafficking.

This Policy will be reviewed annually and a statement published annually in our accounts held at Companies House.

Signed:



Name: David Haddow

Position: Joint Managing Director

Date: 01 March 2023