

Modern Slavery and Human Trafficking 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. Thomas Johnstone Ltd is committed to the abolition of modern slavery and human trafficking and supports the principles of the Modern Slavery Act 2015.

TJL is committed to being an equal opportunities employer ensuring a non-discriminatory and respectful work environment for our employees. We want all our employees to feel confident and able to expose wrongdoing without any potential risk to themselves.

Our people management and recruitment processes are designed to make sure that all potential employees have the legal right to work in the UK. TJL does not enter into business with any organisation which knowingly is found to be involved or supports slavery, servitude as well as forced or compulsory labour.

Subcontract and Supply Chains

This Policy covers all TJL activities and requires that all who have a business relationship with TJL will always act in a way consistent with this anti-slavery and human trafficking policy. TJL operations are only in construction, within Great Britain from its base in Scotland and this Policy reflects that. As part of the company's due diligence processes into slavery and human trafficking, the supply chain approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU which could potentially be more at risk of slavery or human trafficking issues. The level of management control needed for these sources will be continually monitored.

Responsibility

The Directors shall take responsibility and will consult with all departments to ensure that any potential risks are found 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 provided with adequate training and that guidance is available on the issue of modern slavery and human trafficking to ensure that everyone understands and complies with the intent of this policy.

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 conducting appropriate background checks and will only use reputable employment agencies to source our own labour.

Embedding the Principles

TJL will continue to embed the principles of the Modern Slavery Act (2015) through:

- Training staff on the Modern Slavery Act (2015).
- Raising general awareness of modern slavery issues at staff seminars to continue our action to embed a zero-tolerance policy towards modern slavery.
- Making this Policy readily available and easy to access on the company intranet.
- This policy will be shared with all subcontractors and suppliers and included in our Subcontractor and Supplier approval Questionnaire processes.
- Ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices. TJL will not procure from or contract with any business knowingly involved in slavery or human trafficking.

We expect employees to refer to this policy and understand what is needed from them in relation to the prevention of modern slavery.

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

Signed:



Name: David Haddow

Position: Joint Managing Director/Safety Director

Date: 2 May 2024

Signed:



Name: Rod Young

Position: Joint Managing Director

Date: 2 May 2024