JOINTLINE
Safely Marking
The Way Ahead
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POL 13 Modern Slavery, Human Trafficking, and Right to Work Policy Statement

Introduction

This statement sets out the actions of Jointline Limited to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. Additionally, it outlines the measures and controls established by Jointline Limited to comply with Sections 15 to 25 of the Immigration, Asylum and Nationality Act 2006. It is applicable to all current and potential employees, subcontracted staff, self-employed workers, agency staff, and temporary workers engaged by our organisation.

As part of the construction and highway maintenance industry, Jointline Limited recognises that it has a responsibility to take a robust approach to slavery, human trafficking, and illegal working. We are committed to ensuring that all individuals working on our projects have the legal right to work in the United Kingdom and are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are also managing these risks.

Whilst our turnover is less than the specified £36 million required to produce a modern slavery and human trafficking statement, we support our clients in their due diligence process by detailing our voluntary actions in this regard as a responsible employer.

We operate in full adherence to all relevant local and national laws applicable to our business and uphold the highest standards of ethical conduct throughout our operations.

Organisational structure and supply chains

This statement covers the activities of Jointline Limited. We engage in line marking and maintenance of both roads and airfields as well as installation of road studs, saw cutting, grooving, joint sealing and minor civil engineering. Additionally, our teams provide specialist surfacing including resin-based systems, anti-skid solutions, distribution centre markings and forestry frameworks including hard and soft landscaping. Our supply chain is predominantly made up of material suppliers based in the UK as we endeavour to self-deliver most of our activities, but also includes UK based sub-contractors and equipment suppliers mainly from within Europe.

Countries of operation and supply

Most of our work is carried out in the United Kingdom, with England being our principal area of work delivery. Where contract conditions are right, we may carry out work overseas, in particular, airfield marking works. Historically, this has been in countries such as Cyprus, Gibraltar or the Falkland Islands.

Modern slavery risk assessment process

We assess risk in our supply chain through consultations with relevant internal stakeholders. Risk factors include: the location of the supplier, the nature/type of the goods or services provided, the level of control we have over the supplier, the levels of corporate governance demonstrated by the supplier and the supplier's own supply chain.

Following this consultation process, we have assessed our exposure to the risk of slavery and human trafficking as low for the following reasons:

- We are entirely UK based.
- Almost all of our direct suppliers have strong levels of corporate governance and are based in countries where slavery and human trafficking are low risk.
- Our greatest exposure to risk (albeit still very low) may arise further down our supply chains where workers may receive low pay for low skill work, or where raw materials and manufacturing originate in higher risk countries than the UK. Activities further down our supply chain are out of our direct control. We focus efforts primarily on our direct suppliers, most of which are UK-based and therefore obligated to comply with the Modern Slavery Act.

Jointline Limited is committed to ensuring that workers within our operations and supply chain have the freedom to terminate their employment, the freedom of movement, and freedom of association without any detriment.

We strictly prohibit any threat or act of violence, harassment, or intimidation towards any worker, and maintain a zero-tolerance stance on such behaviours.

We categorically prohibit the use of worker-paid recruitment fees and ensure that any recruitment costs are not borne by the workers themselves.

Compulsory overtime is prohibited within our business and supply chain, with working hours complying with applicable labour laws and industry standards.

We maintain a strict policy against child labour and ensure that no individuals under the legal working age are employed within our operations or by our suppliers.

Discrimination of any kind is not tolerated in our workforce or supply chain. We promote equal opportunities in all aspects of employment and service provision.

Jointline Limited does not allow the confiscation of workers' original identification documents at any stage.

Access to remedy, including compensation and justice for victims of modern slavery, is a key pillar of our approach. We will seek to ensure that any victim of modern slavery identified within our operations or supply chains is offered appropriate support and that corrective actions are taken swiftly and effectively.

Responsibility

Responsibility for the organisation's anti-slavery initiatives lies with the directors of Jointline Limited. They are responsible for arranging and regularly reviewing policies, risk assessments, investigations, due diligence, and training requirements.

Relevant policies

Jointline Limited operates the following policies that describe our approach to the identification and prevention of modern slavery, human trafficking, or illegal working risks:

- Whistleblowing policy: Encourages reports of any concerns related to direct activities or supply chains, including slavery or human trafficking risks, ensuring disclosures can be made confidentially without fear of retaliation.
- Employee code of conduct: Sets clear expectations regarding ethical behaviour in all aspects of work, representing Jointline Limited with integrity.
- Supplier requirements: Suppliers must demonstrate safe working conditions, dignity and respect towards workers, compliance with legal standards, prohibition of worker-paid recruitment fees, prohibition of compulsory overtime, and zero tolerance for child labour and discrimination. Serious violations will lead to termination of the supplier relationship.

Due diligence

Jointline Limited undertakes due diligence when onboarding new suppliers and regularly reviews existing suppliers, including:

- Broadly mapping key supply chains through discussion to assess products or geographical risks.
- Evaluating risks associated with each new supplier via annual sub-contractor assessment forms.
- Reviewing supply chains periodically in QSHE meetings.
- Applying sanctions against suppliers failing to improve performance or breaching codes of conduct.

Right to Work

Our right to work procedures are compliant with Home Office guidance and include verification of original documentation, retention of records for two years post-engagement, periodic reviews, and training for personnel involved in recruitment and onboarding.

Training Training on modern slavery and human trafficking is included as part of our group-wide training programme to raise awareness and ensure understanding of responsibilities.

Awareness-raising programme Modern slavery awareness statements are displayed at each Jointline division. Staff are encouraged to contact any director for further information.

Director approval This statement has been approved by the operational Directors of Jointline Limited and will be reviewed and updated annually.

Authorised by: **Gary Massey**
Position: **Managing Director**
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Next review by: **11th February 2027**
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