



Safely Marking  
The Way Ahead  
jointline.co.uk

## **Modern Slavery & Human Trafficking 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.

As part of the construction and highway maintenance industry, the Jointline Limited recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

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

### **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, various surface treatments and joint sealing. Our supply chain is predominantly made up of material suppliers based in the UK but also contains UK based sub-contractors and equipment suppliers from within Europe.

#### *Countries of operation and supply*

The organisation currently operates in the following countries:

England, Northern Ireland, Republic of Ireland, Scotland and Wales with occasional works being priced for countries such as Gibraltar, Cyprus and the Falkland Islands. The vast majority of our work is carried out in England.

The following is the process by which we assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

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.
- We perceive 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. As such, we have focussed our efforts on our direct suppliers, most of which are UK-based and therefore obliged to comply with the Modern Slavery Act.
- We believe that our anti-slavery and human trafficking strategy described in this Statement is proportionate to the risks we face in our business and supply chain and any risks are mitigated by existing and new policies, procedures, training and diligent procurement processes.

We do not consider that we engage in any high risk activities in terms of human trafficking and modern slavery.

### *Responsibility*

Responsibility for the organisation's anti-slavery initiatives lies with the Operational Directors of Jointline Limited, namely Pete Charters, Gareth Preston & Sean Cook. They are responsible for arranging and regularly reviewing our policies, risk assessments, investigations, due diligence and training requirements.

### **Relevant policies**

Jointline Limited operates the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations

**Whistleblowing policy** Jointline Limited welcomes reports from all its workers, customers and other business partners of any concerns related to the direct activities, or our supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can telephone any Director in confidence on 01522 868636.

**Employee code of conduct** Our ethical policy and employee handbook makes clear to employees the actions and behaviour expected of them when representing Jointline Limited. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

**Supplier requirements** Jointline Limited is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. This is done through a commitment to the Modern Slavery Act 2015. Serious violations will lead to the termination of the business relationship.

### **Due diligence**

Jointline Limited undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier through the requirement of annual completion of a sub-contractor assessment form.
- reviewing on a regular basis all aspects of the supply chain at our quarterly QSHE meeting.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our required code of conduct, including the termination of the business relationship

### **Training**

As part of our group-wide training programme, we are currently exploring training on slavery and human trafficking for our workforce. All new starters are issued with the Staff Handbook which will include a reinforced commitment to anti-slavery at the next revision.

### **Awareness-raising programme**



Safely Marking  
The Way Ahead  
[jointline.co.uk](http://jointline.co.uk)

Jointline Limited has raised awareness of modern slavery issues by placing this statement on notice boards at each division.

Staff are encouraged to ring any Director should they require further information on our modern slavery statement.

### **Director approval**

This statement has been approved by the operational Directors of the Jointline Group, who will review and update it annually.

Authorised by: Pete Charters  
Position: Finance Director  
Date: 22nd August 2018  
Issue: 2