

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, the 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 are supporting our clients in their due diligence process by detailing our voluntary actions in this regard as a responsible employer.

Our aim is to create a safe and legally compliant working environment for all.

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 contains UK based sub-contractors and equipment suppliers from within Europe.

Countries of operation and supply

The organisation currently operates in the following countries:

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.

The following is the process by which we assess whether 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 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 directors of Jointline Limited. 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, human trafficking or illegal worker 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 in our home market, overseas and when 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 products 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.

Right to Work

Our approach to verify the right to work of those applying for a role within our business are compliant with the current Home Office guidance, "Comprehensive Guidance for Employers on preventing Illegal working." We acknowledge the importance of verifying the right to work status of all workers, including current and potential employees. Most of our staff are directly employed and on long term contracts, but should it be applicable, this policy will also apply to subcontracted staff, self-employed workers, agency staff, and temporary workers. This will be achieved through the following processes:

Document Verification

- All individuals that we employ, including subcontractors and self-employed workers will be required to provide original, acceptable documentation as evidence of their right to work in the UK. This includes:
 - A passport or biometric residence permit.
 - A document confirming British citizenship, settled status, or other lawful immigration status.
 - Other documents specified by the relevant, current, Home Office guidance.

Retention of Documents

Copies of all right to work documents will be retained for at least two years after the individual has left our employment, in accordance with Home Office guidance.

Periodic Review

We will conduct periodic reviews to assure ourselves that our employees, subcontracted staff, and self-employed workers maintain their right to work status throughout the duration of their engagement in alignment with our obligations under the Immigration, Asylum, and Nationality Act 2006.

Compliance

Non-compliance with this policy may result in disciplinary action, which may include termination of employment or engagement, where appropriate.

Reporting Suspected Illegal Workers

If an employee or contractor suspects that an individual working on our projects may not have the legal right to work in the UK, they are obliged to report it to our HR department or a Director immediately.

Training

As part of our group-wide training programme, we undertake training on slavery and human trafficking for our workforce. All employees involved in the recruitment, onboarding, and management of workers will receive appropriate training on right to work checks to ensure compliance with this policy.

Awareness-raising programme

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 policy will be reviewed periodically to ensure its ongoing effectiveness and compliance with any changes in legislation or Home Office guidance. Any necessary amendments will be made promptly and communicated to all relevant parties. This statement has been approved by the operational Directors of Jointline Limited, who will review and update it annually.

Authorised by:	Gary Massey
Position:	Managing Director
Review date:	12th October 2023
Next review by:	12th October 2024
Issue:	8