

1) ORGANISATION

This statement applies to JDevine Civil Engineering (referred to in this statement as 'the Organisation').

2) ORGANISATIONAL STRUCTURE

JDevine Civil Engineering work predominately in the South of England. The company operates on a regional basis across Sussex, Hampshire and Surrey and overall control is served by the main office which is located in Sutton.

Work is carried out on a client lead project specific contractual basis across the regions. This means that project locations are highly transient. The labour supplied to the Organisation in pursuance of its operation is carried out in the sector

3) DEFINITIONS

The Organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

4) COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the moral and legislative standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, and in many cases exceeds those minimums in relation to its employees.

5) SUPPLY CHAINS

In order to fulfil its activities, JDevine Civil Engineering main supply chains include those related to the supply of construction materials and labour. These are sort within the UK and therefore are subject to UK legislation. All our supply chain undergo a pre-qualification process where they must sign a code of conduct which sets out JDevine Civil Engineering core values and standards of behaviour. The code is in line and exceeds the current legislative compliance and moral societal thinking. We constantly monitor our supply chain through supply chain audits and management performance review.

6) POTENTIAL EXPOSURE

JDevine Civil Engineering considers its main exposure to the risk of slavery and human trafficking to exist from imported construction materials from sources outside the UK, EU and countries outside through suppliers to recognised UK construction materials retailers. It is recognised that this is a sector that is more likely to engage in this type of practice and countries outside of the UK are potentially more likely to partake in slavery/human trafficking issues as protection against breaches of human rights may be limited.

In general, JDevine Civil Engineering considers its exposure to slavery/human trafficking to be low, nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

7) STEPS

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Board level commitment to the implementation of the Modern Slavery and Human Trafficking policy
- Sub-contractor and supplier approval process will incorporate a review of the controls undertaken by them prior to them being included on the preferred suppliers list.
- Zero tolerance the JDevine Civil Engineering will not support or deal with any business knowingly involved in slavery or human trafficking.
- Developing and implementing codes of conduct in line with JDevine Civil Engineering values and societal moral values.
- Providing training, posters, awareness material and guidance on spotting slavery
- Working with overseas clients who share similar values to evaluate local labour and material suppliers
- Carrying out supply chain audits
- Implement and embed an open door speak up philosophy throughout the business

8) KEY PERFORMANCE INDICATORS

JDevine Civil Engineering has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

- Zero occurrences of modern slavery through supplier audit
- All staff trained in modern slavery
- Internal audit findings

9) POLICIES

The Organisation has the following policies which further define its stance on modern slavery

- Ethical Purchasing Policy Statement
- Subcontractor & Supplier Code of Conduct
- Recruitment and Selection Policy
- Modern Slavery and Anti Trafficking policy statement

10) TRAINING

JDevine Civil Engineering provides the following training to staff to effectively implement its stance on modern slavery.

Initial Training is via company induction, review and signing the employee code of conduct. Information is also taken away in the staff handbook.

Ongoing training is undertaken in the form of toolbox talks, awareness posters and supply chain school videos.

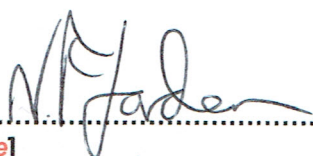
<https://www.supplychainschool.co.uk/default/modern-slavery.aspx>
<https://www.supplychainschool.co.uk/uk/fir/construction/default.aspx>

We also download a variety of posters in various languages from the Government website

<https://www.gov.uk/government/publications/modern-slavery-closer-than-you-think>

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval.....4th JANUARY 2021

Signed.....
[Insert title]

MANAGING DIRECTOR