

## ANTI-SLAVERY POLICY

### Introduction

Modern slavery is a crime that affects many people across the world. We all in Jones Bros Ruthin (Civil Engineering) Co Ltd have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. All Staff are expected to report concerns and management are expected to act upon them.

### Organisation Structure

Jones Bros Ruthin (Civil Engineering) Co Ltd is one of the UK's leading civil engineering contractors with a wealth of experience across a broad range of sectors. The Group's head office is based in North Wales and operates on projects throughout the UK.

### Our Supply Chains

We aim to provide most of the labour and staff resources required to fulfil the civil engineering project requirements through our directly employed workforce. Our supply chains includes the sourcing of plant, materials, professional services and subcontractors and additional staff and labour where required.

### Our Policies on Slavery and Human Trafficking

Jones Bros Ruthin (Civil Engineering) Co Ltd is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### Supplier Adherence to Our Values

Jones Bros Ruthin (Civil Engineering) Co Ltd has a zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. The Directors and Senior Managers are responsible for compliance in their respective regions and for their supplier relationships.

### Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk:

- We perform the relevant background checks for all prospective directly employed members of staff.
- Where possible we build long-standing relationships with local suppliers and subcontractors and make clear our expectations of business behaviour.
- We expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain.
- We have systems in place to encourage the reporting of concerns and the protection of whistle blowers.

### Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors and Senior Managers have been briefed on the subject.

### **Our Effectiveness in Combating Slavery and Human Trafficking**

We will perform audits to check the satisfactory completion of employee take-on procedures and supplier/subcontract vetting procedures.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

### **Review**

This policy will be reviewed annually and any changes made communicated to all employees.



John Dielhof  
Managing Director  
November 2024