



### Modern Slavery Policy

This policy is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that GSJP Civil Engineering has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. GSJP has a zero-tolerance approach to any type of modern slavery. We are dedicated to acting ethically and with integrity and clarity in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **GSJP**

GSJP Civil Engineering Ltd are a groundworks and civils contractor. We have a wide & varied supply chain and maintain good communications and relations with all.

### **Our Policies**

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-Bribery Policy. The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.
2. Data Protection policy. The purpose of this policy is to protect all data of employees from being distributed illegally.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisal.
4. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

### **Our suppliers**

GSJP operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.

5. We may terminate the contract at any time should any instances of modern slavery come to light.

### Warning Signs

Be suspicious of counterfeit and fraudulent items if you encounter any of the following warning signs:

<b>1)</b>	Identification Markings	Alterations, wrong size, location, marking method incorrect, smudged, or blurred, lot or batch numbers missing, incorrect supplier's logo
<b>2)</b>	Product Condition	Resurfaced / refinished, evidence of re-work, wrong colour, shape or size, data, or previous use (used item)
<b>3)</b>	Paperwork / Certificate of Conformity	Accompanying paperwork has poor spelling or grammar, errors or evidence of tampering, missing information or does not relate to the delivered product
<b>4)</b>	Lot Information	Unusual serialisation or reference numbers, lot information missing
<b>5)</b>	Chain of Ownership	Unverifiable traceability to source
<b>6)</b>	Unusual Location	Items delivered from a location differing from previous or from prohibited countries
<b>7)</b>	Low Price	A price significantly lower than historical pricing data or market norm
<b>8)</b>	Availability	Obsolete or scarce items suddenly becoming available
<b>9)</b>	OEM Certification	Unavailable OEM certification or uncertified OEM
<b>10)</b>	Unfamiliar Supplier	Supplier or agent / stockist not known or previously used

### Authorisation Signed



**George Parker**

**Director**

Date: 01 Jan 2021