



A E YATES GROUP: POLICY STATEMENT AGAINST MODERN SLAVERY AND CHILD LABOUR

Modern Slavery encompasses slavery, forced and compulsory labour and human trafficking. It includes adults and children being forced to work against their will. It has a devastating effect on individual victims.

We are committed to ensuring that there is no modern slavery in our supply chain or in any part of our business.

Organisation Structure

This statement covers the activities of the Companies which comprise the A E Yates Group. The Group carries out its activities across the UK but not internationally.

A E Yates Ltd. is a civil engineering contractor and is a 75% employee owned company.

SPI Piling Ltd. is a specialist sheet piling contractor and is a wholly owned subsidiary of A E Yates Ltd.

Tritech Ground Engineering Ltd. is a part of the trading group, and is an associate company, not a subsidiary. Its works involve driven piling, vibro stone and concrete columns and other ground engineering solutions.

Combined Soil Stabilisation Ltd. is a part of the trading group, and is an associate company, not a subsidiary. Its works involve soil stabilisation and modification.

A E Yates Directional Drilling Ltd. is neither an associate company nor a subsidiary, but it is part of the same trading group. It works in the UK and Ireland carrying out specialist horizontal directional drilling works.

Compliance with the Modern Slavery Act 2015

Some of the Companies individually have a turnover which is large enough for them to have to supply a statement pursuant to s54(1) of the Modern Slavery Act.

If taken as a group, the combined turnover of A E Yates Ltd. and its subsidiaries does necessitate compliance. We have zero tolerance to modern slavery and expect those in our supply chain to comply with our values.

Safeguarding

The majority of our works do not bring us into contact with children or vulnerable people and our activities are not those where safeguarding would normally apply. However, we take the protection of others and the prevention of abuse seriously. In the event that safeguarding issues are likely, all staff involved in the project will be subject to DBS

checks. These checks will also apply where we are required to work on projects where there are security concerns, such as critical national infrastructure.

Responsibility

Responsibility for the A E Yates Group's anti-slavery initiatives is as follows: -

- Policies will be written by the HR department with input from other departments, where applicable. They will be reviewed and approved by the Boards of each Company.



- There are no known or suspected instances of modern slavery, but in the event that concerns are raised, investigations will be initially carried out by the HSQE department.
- The integrated management system will be used to assess the risk of modern slavery in our supply chain (by use of supplier assessment procedures). The commercial departments of each Company shall be responsible for ensuring that those procedures are followed.

Risks

The A E Yates Group works within the construction industry sector. Whilst the sector can be viewed as having a high risk of modern slavery, we do not consider that our business activities are high risk. Our assessment indicates that the main areas of risk relate to our supply chain, particularly in regard to labour supply.

Indicators

- Abuse of vulnerability
- Deception
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

What we already do

We have in place systems to encourage all workers to report any concerns related to our business activities, such as our whistleblowing policy and our grievance procedure, and;

- We check the legal status of our directly employed workforce.
- We build relationships with trusted suppliers.

Steps to be taken to address risks

If we use recruitment Companies or labour supply agencies we will:-

- Ask them for a declaration that workers are not required to pay fees.
- Ask them to check that all workers supplied have the legal right to work in the UK.

For other parts of our supply chain, irrespective of their size, we will:-

- Require our suppliers to demonstrate that they too are committed to eradicating modern slavery by demonstrating that they have their own adequate procedures or by committing to abide by ours.
- Where possible build long standing relationships with local and trusted suppliers.
- Make our point of contact a UK Company or branch, where possible.

For our own business activities we will:-

- Reinforce whistleblowing and grievance systems and widen them to allow reporting from not just our employees, but all workers on our sites and from our customers. Concerns can be raised not just in relation to our direct business activities, but also those of our supply chain.



Training

We understand that the concept of modern slavery is a difficult one for some of us to understand and that the legal requirements to deal with it are new. We will therefore provide the following training:-

- All of our workers will receive a note briefly describing modern slavery and listing signs to spot potential victims and what to do if they wish to raise concerns.
- Any of our staff or managers who have responsibility for labour or for procurement will also receive “Modern Slavery: A Briefing for the Construction Industry” together with guidance from the IMS and Sustainability Manager on supplier assessment.
- All Directors shall review the documents, receive further information and take part in a discussion and question and answer session.
- Our wages departments will be advised to highlight any concerns
- At all times, further advice is available from a legally qualified member of staff.

Key Performance Indicators for 2023

The following targets will be reviewed at board level at the end of the year.

- 100% of directly employed staff recruited into any of the group businesses will receive the gov.uk fact sheet on Modern Slavery: A Briefing for the Construction Industry. This target was met in 2023 and we continue to do so.
- 95% of subcontractors engaged by group businesses to provide evidence of their arrangements to prevent modern slavery
- Our supplier assessment procedures will be used in a minimum of 75% of supplier engagements to assess the risk of Modern Slavery in the supply chain
- 100% of newly recruited directly employed staff to submit to right to work in the UK checks. This target was met in 2023 and we continue to do so.

J C Whitehead
Chairman