

## **MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR ENDING 31 DECEMBER 2019**

### **1. INTRODUCTION**

Ardmore is a family owned business operating mainly in and around London, specialising in the construction sector. We recognise that modern slavery exists within every sector and supply chain and that the business has a responsibility to help tackle modern slavery in the UK. We are, therefore, proactively implementing processes and procedures within our business to ensure that modern slavery, human trafficking and forced labour are not taking place anywhere within our business.

It is estimated there are approximately 10,000 to 13,000 potential victims of modern slavery in the UK today but it is considered that this is just the tip of the iceberg, as it is reckoned to be the fastest growing criminal industry in the world. We recognise that our business operates within a sector which is particularly vulnerable to forced labour and modern slavery offences. We are, therefore, mindful of our role in helping to prevent hidden labour exploitation.

Our values are strongly focused on people and relationships and our approach to tackling modern slavery builds upon our mission and values. In this modern slavery statement we have set out the steps we are taking to minimise the risks to our business and within our supply chains.

As part of our planned actions for 2019, we will continue to keep under close review the effectiveness of our Modern Slavery Policy and the processes and procedures outlined in this statement.

### **2. INDUSTRY COLLABORATION**

We understand that there is a clear moral case for eliminating modern slavery and human rights offences. As a main contractor we take seriously our responsibility for tackling modern slavery and improving the construction sector's reputation. We acknowledge the need to take a collaborative approach with our industry peers and have signed up to the Gangmasters and Labour Abuse Authority's Construction Protocol which is a joint agreement aimed at establishing collaboration within the construction industry. The Protocol commits signatories to work in partnership to protect vulnerable workers, share information to help stop or prevent exploitation and commit to raising awareness within the supply chain.

### **3. GROUP STRUCTURE AND SUPPLY CHAINS**

Ardmore is a family owned construction business, principally engaged in public and commercial contracting, residential and mixed-use development. The Group operates its headquarters in Wharf Road, London, N17GR, and has approximately 300 directly employed staff. The Ardmore Group primarily comprises Ardmore Construction Limited and Paddington Construction Limited. The Group's supply chain is considerable and covers contractors, consultants, labour agencies, materials suppliers, service providers, and clients.

We expect our supply chain partners to comply with our values and ethics through early engagement and collaboration. We operate a strict recruitment Preferred Suppliers List and have agreements in place with them to ensure they are carrying out the appropriate due diligence and carrying out the relevant checks for their candidates.

As part of our commercial supply chain engagement process we have updated our contract documents to include legal obligations to comply with the Modern Slavery Act and our policy. These are used across the business with any part of our supply chain.

### **4. OUR POLICIES, STRATEGY & GOVERNANCE**

We recognise our moral and ethical responsibilities to do all that we can to ensure our business and supply chain is slavery free. Along with our Modern Slavery Policy, we have a number of other corporate policies setting out the Company's commitment to its responsibilities including Corporate Social Responsibility, Whistleblowing, Preferred Supplier List, Code of Conduct, Conflict of Interest, Anti-Harassment & Bullying, and Anti-Bribery & Corruption.

We recognise that our success depends on the skill, knowledge, integrity, and commitment of our employees and we aim to provide a happy, healthy and safe working environment. If our employees have genuine concerns regarding any suspected wrongdoing or danger at work, including suspected slavery or labour exploitation, then they are encouraged to raise their concerns in accordance with our Whistleblowing Policy or our Modern Slavery Policy. These policies

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provide guidance on how to raise concerns and how the business will investigate and deal with such concerns appropriately without any fear of reprisal on the part of the employee.

### **5. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

We have devised a robust Right to Work process which the business follows rigorously. In addition, our Recruitment & Selection Policy sets our minimum standards for recruitment. We have internal recruiters who are vigilant in identifying possible cases of Modern Slavery or Human Trafficking, and any concerns are reported accordingly. In addition, we follow rigorous payment and site processes which also allow for vigilance in recognising the signs of potential Modern Slavery or Human Trafficking. We have, on a number of occasions reported suspected cases of exploitation.

### **6. RISK ASSESSMENT**

Modern Slavery has been added to the company Risk Register and compliance with the policy will be monitored via this process on a regular basis.

### **7. MEASURING EFFECTIVENESS**

We will measure the effectiveness of our policy and processes by carrying out annual employee surveys to assess awareness of the matter and reporting mechanisms.

We will also maintain a register of all concerns raised and the action taken.

### **8. AWARENESS & TRAINING**

During 2019 we are providing further guidance and support to all our employees to raise awareness of modern slavery and human trafficking in the construction industry. This will include a poster and leafleting campaign in our offices (in a number of languages) and sites giving information about our Modern Slavery Policy, which will include information about how to confidentially report concerns or incidents. We have also included a section in our company induction and in site inductions to ensure that all those commencing work for Ardmore are aware of their responsibilities.

We are also conducting site briefings to provide more knowledge on spotting the signs of forced labour and slavery, how to deal with such concerns and what to do in the event that such a person or persons are found on our sites.

In addition, we will be looking at ways in which we can raise awareness within our Supply Chain Partners.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2019. This statement was approved by the company's Managing Directors, who review and update it annually.



**Patrick Byrne**  
Managing Director



**Cormac Byrne**  
Managing Director

**9<sup>th</sup> January 2019**