

Griffiths is a Welsh sustainable civil engineering contractor that helps connect communities through road, rail, water and utilities

Modern Slavery Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Alun Griffiths (Contractors) Limited (AGCL) has taken during the financial year ending 31 March 2026 to prevent modern slavery and human trafficking within our business and supply chain.

Our Organisation

AGCL is a Welsh civil engineering contractor delivering sustainable infrastructure and construction projects across the highways, rail, water, utilities and environmental sectors. Our activities include project management, construction, maintenance, engineering and related support services.

We employ a directly employed workforce and engage a network of specialist subcontractors, suppliers, labour providers and professional service partners who support the delivery of our projects throughout Wales, the Midlands and the South-West.

We carry out Right to Work checks on job applicants prior to issuing employment contracts, using the Gov.UK right to work checking service. We have verified the Right to Work of all our employees as many were recruited prior to the introduction of the Modern Slavery Act 2015.

Our Supply Chain

Our supply chains include:-

- Construction materials suppliers
- Plant and equipment suppliers
- Subcontractors and specialist contractors
- Labour agencies and recruitment providers
- Professional service providers
- Logistics and transport providers

We recognise that the construction sector can present potential risks relating to labour exploitation, particularly where temporary labour, agency workers and lower-tier supply chains are involved.

Our Policies

AGCL is committed to operating ethically and with integrity in all business dealings.

Our approach to preventing modern slavery is supported by a range of policies and procedures, including:

- Modern Slavery & Human Trafficking Policy
- Whistleblowing Policy
- Equal Opportunities Policy
- Recruitment and Employment Procedures
- Procurement and Supply Chain Management Procedures

These policies support our commitment to protecting workers' rights and ensuring compliance with legal and ethical standards.

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Due Diligence Process

To minimise the risk of modern slavery within our business and supply chains, AGCL undertakes the following due diligence activities:

- Supplier pre-qualification and assessment processes
- Requiring suppliers to be Constructionline Gold or Silver accredited which means there an additional layer of verification of compliance with the Modern Slavery Act
- Verification of supplier compliance with modern slavery legislation
- Screening of labour providers and recruitment agencies before engagement
- Contractual requirements for suppliers and subcontractors to comply with the Modern Slavery Act 2015
- Ongoing supplier performance monitoring
- Investigation of any concerns raised through whistleblowing or management reporting channels

We only engage reputable employment agencies and labour providers and seek evidence that workers are recruited legally and fairly.

Risk Assessment and Risk Management

We continually assess the areas of our business and supply chain that may be more vulnerable to modern slavery and labour exploitation.

Potential higher-risk areas include:

- Agency and temporary labour
- Labour-intensive subcontracting activities
- Lower-tier supply chains where visibility may be reduced
- Suppliers operating in sectors or regions considered higher risk

To manage these risks, we:

- Carry out supplier due diligence before appointment
- Additional layer of verification through Constructionline Gold or Silver accreditation
- Require compliance with modern slavery legislation through contractual terms
- Monitor labour providers and subcontractors
- Encourage the reporting of concerns through confidential channels
- Review procurement practices and supplier performance regularly

Measuring Effectiveness

AGCL monitors the effectiveness of its approach through a range of performance indicators, including:

- Completion of supplier due diligence checks, including through the Constructionline Portal
- Number of suppliers assessed against ethical and modern slavery requirements
- Modern slavery training completion rates
- Whistleblowing reports relating to labour practices
- Supply chain audits and reviews completed
- Corrective actions implemented where concerns are identified

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These indicators help us assess the effectiveness of our controls and identify opportunities for continuous improvement.

Matters relating to the key performance indicators are actioned by the Senior Leadership Team and the Board of Directors.

No incidents of modern slavery or human trafficking were identified within our operations during the reporting period.

Training and Awareness

AGCL provides awareness training on modern slavery and human trafficking to relevant employees, particularly those involved in:

- Procurement and supply chain management
- Human resources and recruitment
- Project management and operational leadership

Training covers:

- Understanding modern slavery risks
- Recognising indicators of exploitation
- Reporting concerns
- Responsibilities under the Modern Slavery Act 2015

We raise awareness about *Unseen* (the UK Modern Slavery Helpline) and we are committed to maintaining awareness across the organisation and strengthening our capability to identify and respond to potential risks.

Future Commitments

During the next reporting period AGCL will continue to:

- Review and strengthen supplier due diligence processes
- Increase supply chain engagement on modern slavery risks
- Enhance employee awareness and training
- Monitor and improve the effectiveness of our anti-slavery controls

Approval

This statement was approved by the Board of Directors of AGCL and is signed on its behalf. It will be reviewed regularly and re-issued annually or earlier if required.



Tim James

Managing Director

20th July 2026