



Modern Slavery and Human Trafficking Policy Statement

Legal

Modern Slavery and Human Trafficking Policy Statement

POL-LG-005





Modern Slavery and Human Trafficking Policy Statement

1 Company Structure

John Sisk & Son Ltd, JSS Rail Limited and John Sisk & Son (Holdings) Limited, are members of the Sisk Group, an international construction company involved in construction, distribution, manufacturing and property. Sisk UK operates predominantly in the UK and Ireland. Our ultimate Parent Company is Sicon Limited. Sicon Limited has its head office in Ireland. The Sisk Group has approximately 1,972 employees.

We work closely with a number of suppliers and subcontractors. The majority of these businesses operate within the UK and this statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015, setting out the steps we believe, mitigate our risk with respect to slavery and human trafficking.

2 Policy Statement

Modern Slavery is a serious crime, violating an individual's fundamental rights. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This Anti-slavery Statement 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 business or our supply chains.

Sisk's 'Zero Philosophy' is applied to everything we do at every level of our organisation. The philosophy is also applied to our zero tolerance to slavery and human trafficking. In order to ensure all those in our supply chain comply with our values, we require our supply chain to contractually commit to compliance with this Policy Statement.

Our recruitment processes are both transparent and thorough. We have robust procedures in place for vetting new employees and ensuring we are able to accurately confirm their identities.

3 Due Diligence

As part of Sisk's on-going commitment to comply with the Modern Slavery Act, 2015, Sisk will both continue to monitor and mitigate any risks within Sisk and our supply chain, so that effective controls and contingency plans can be put in place if required.

We ensure our Supply Chain Prequalification procedures are robust and include appropriate provision for ascertaining the measures taken by our supply chain to help eradicate modern slavery. Our procedural controls are reinforced by our strategic procurement approach to developing preferred supplier relationships with key supply chain partners, including for example labour and logistics providers with whom we work repeatedly and know very well. As part of our strategic relationship, these providers continue to actively support Sisk in raising internal awareness on the risks of modern slavery by presenting to our staff through internal webinars.

We operate a programme of Independent Labour Practice Audits with our suppliers and/or trade contractors to monitor compliance and resolve any points of awareness that arise in the Audits.

The success of this Policy Statement is dependent upon all employees, supply chains and subcontractors playing an important part in helping to detect and eradicate slavery. As such, all individuals are encouraged to report any suspected slavery to our "Speak Up" helpline, the details of which are at all our sites, offices and on the intranet.



Modern Slavery and Human Trafficking Policy Statement

4 Training

To ensure a clear understanding of the Modern Slavery Act 2015 and the risks, we provide annual training to relevant members of staff.

In our capacity as a partner member of the Supply Chain Sustainability School, e-learning modules were developed on the Modern Slavery Act which are available to any members of the Sustainability School.

5 Internal Policies

This Policy Statement is supported by our internal policies which assist in ensuring that we conduct our business in a transparent manner, implementing effective controls to, for example, promote equal opportunities. These policies implement effective systems to ensure, as far as is practical, that human trafficking and slavery are not taking place in Sisk or any of our supply chain.

6 Summary

This statement is made pursuant to s.54(1) of the Modern Slavery Act 2015 and serves as our Modern Slavery and Human Trafficking statement for the year ending 31 December 2021. This statement is approved by the Chief Executive on behalf of the Board and will be reviewed annually.

Paul Brown

CEO

9th June 2022