

# Anti-Slavery and Human Trafficking Statement

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## 1: Opening statement from senior management

A.T. Jones & Son Limited (AT Jones), AT Turnkey Limited (AT Turnkey) are committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes the same high standards on its suppliers.

AT Jones & AT Turnkey take a zero-tolerance approach to slavery and human trafficking and we expect our supply chains to take the same stance. We are committed to developing and maintaining effective systems and controls to ensure that we address the threat of modern slavery within our business and in all our business relationships, in our supply chains. Through our involvement in the Stronger Together community, we also work alongside other organisations in the construction industry to promote good practice and increase the understanding and awareness of modern slavery and human trafficking in our industry.

## 2: Structure of the organisation

AT Jones & AT Turnkey are construction companies working in both the public and private sectors. It employs 95+ people and has business operations across the UK, with offices based in Fareham, Newbury & London. To find out more about the nature of our business, please visit our website: <https://www.atjones.net/company/about-a-t-jones/>.

We work with a supply chain that includes contractors, sub-contractors, suppliers, manufacturers, professional consultants (providing design and other building related services), labour agencies and others. We contract with these organisations for the provision of works, goods, services, labour and other.

## 3: Policies

As part of our commitment to combating modern slavery, we have implemented an Anti-Slavery Policy which can be found on our website and on our SharePoint for all members of the ATJ Group – AT Jones & AT Turnkey to have access to.

All members of our supply chains are aware of our policies and we rely on them to adhere to the same high standards, as we are aware of the importance of working together as this issue cannot be tackled and solved alone.

## 4: Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures; prequalification questionnaires for all new subcontract labour, right to work checks are undertaken for every new operative & employee with relevant follow up checks scheduled and undertaken, this is monitored by

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our HSQE Audits and internal HR Procedures. Our suppliers are audited annually to review their practices and ensure limited risk with regard to modern slavery and human trafficking.

Our pre-qualification questionnaire for new subcontract labour requires completion and subsequent signature to confirm their adherence to our policy and confirmation of endeavouring to reduce the risk of human trafficking and modern slavery within our industry. Our policy is provided along with our prequalification statement at first point of contact and reinforced on site via the means of toolbox talks, online training and access to the statement, policies and toolkit where required.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains;
- monitor potential risk areas in our business and supply chains;
- reduce the risk of slavery and human trafficking occurring in our business and supply chains;
- provide adequate protection for whistle-blowers.

### 5: Risk and compliance

AT Jones & AT Turnkey regularly evaluate the nature and extent of their exposure to the risk of modern slavery occurring in its supply chain by diligently prequalifying all new clients and or subcontract businesses we engage with. On a 6 monthly basis our Board of Directors or Senior Management Group review our practices and highlight any additional risk requiring attention by the respective teams.

We recognise that construction is deemed to be a high-risk sector for modern slavery and human trafficking and that risks exist in procurement processes (for works, services and goods/materials), recruitment practices and site management. Projects often include a large number of contractors, including lower skilled trades which increases the potential risk of labour exploitation. We are committed to reducing the risks through our due diligence.

We require that all those in our supply chain comply with our values and we ensure that they adhere to our Anti-Slavery Policy. We enforce a strict code of compliance and do not tolerate slavery or human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policy, we will immediately seek to terminate our relationship with the relevant supply chain member. All members of our supply chains are required to notify AT Jones & AT Turnkey as soon as they become aware of any instance of modern slavery or human trafficking taking place within any part of their business or in their supply chain.

### 7: Training

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify

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and report any potential breaches of our anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains. Examples of training courses we have administered over the past year include:

- Toolbox talk
- Stronger Together Training
- Tool Kits available on line

### **8: Further actions and sign-off**

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to continue to take steps to tackle slavery and human trafficking via the means of ongoing training (new online course being created), awareness and enhanced due diligence.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes AT Jones' & AT Turnkey's slavery and human trafficking statement for the financial year commencing 01<sup>st</sup> October 2020 and ending 30<sup>th</sup> September 2021.

This statement was approved by Barry Beesley on 09<sup>th</sup> November 2020.

**Barry Beesley**  
Managing Director



November 2020