



Modern Slavery and Human Trafficking Statement 2021

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 our business has a responsibility to help tackle modern slavery in the UK. We have therefore implemented processes and procedures 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 particularly 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 2021, we will continue to keep under close review the effectiveness of our modern slavery policy, and the processes and procedures outlined in this statement.

Industry Collaboration

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 to raising awareness within the supply chain.

As a business, we have worked closely with the Gangmasters and Labour Abuse Authority to try to help raise awareness across our industry. This has included engaging in discussions with the Metropolitan Police, and delivering a presentation at the Gangmasters and Labour Abuse Authority Construction Forum in London in 2019. The aim of this was to communicate ideas and explain what we have done to help tackle modern slavery in our business, which helped lead to the arrest and conviction of the infamous Lupu brothers, who received prison sentences totalling 28 years.

Group Structure and Supply Chains

Ardmore is principally engaged in public and commercial contracting, residential and mixed-use development. The Group operates its headquarters at 6 Wharf Studios, 28 Wharf Road, London, N1 7GR, and has approximately 350 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, to ensure that they are carrying out the appropriate due diligence and conducting the relevant checks for their staff.

As part of our commercial supply chain engagement process, we have updated our procurement contract documents relating to the Modern Slavery Act 2015, and our related policies. These are used across the business with every part of our supply chain.



Our Policies, Strategy, and 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;
- Code of conduct;
- Conflicts of interest;
- Anti-harassment and bullying; and
- Anti-bribery and corruption.

We recognise that our success depends on the skill, knowledge, integrity, and commitment of our staff, 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, they are encouraged to raise their concerns in accordance with our Modern Slavery Policy or Whistleblowing Policy. These policies provide guidance on how to raise concerns, and how the business will investigate and deal with such concerns appropriately.

Due diligence processes for slavery and human trafficking

We have devised a robust Right to Work process which the business rigorously implements. In addition, our Recruitment and Selection Policy sets out 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 and our resourcing Supply Chain are asked annually to detail their own processes and policies in place to mitigate the risks around modern slavery and human trafficking. 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.

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.

Measuring Effectiveness

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

We have set up a register of all concerns raised, and the action taken.

Awareness and Training

We believe in educating our staff on the risks of modern slavery and human trafficking and have taken steps to achieve this.

For example, during 2019 we:

- delivered awareness briefings and toolbox talks to all our staff in order to raise awareness of modern slavery and human trafficking in the construction industry, how to spot the signs and what to do if they have concerns;



- carried out a poster campaign (in a number of languages), sharing information about our Modern Slavery Policy, which includes information about how to confidentially report concerns or incidents;
- included a section in our company induction and in site inductions, to ensure that all those commencing work for Ardmore are aware of their related responsibilities; and
- put in place processes to spot potential discrepancies in personal information provided during induction, for example, duplicate home addresses, duplicate bank account details, etc., which may suggest possible cases of modern slavery.

During 2021, we will be looking at ways in which we can further raise awareness within our supply chain, and keep the momentum going on our sites and across our business, this will include refresher training on the key issues surrounding the Modern Slavery Act and how to raise a concern internally and externally.

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 year ending 31 December 2021. This statement was approved by the company's managing directors, who review and update it annually.

Patrick Byrne
Managing Director

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