
Modern Slavery Act 2015

Anti-Slavery & Human Trafficking Policy Statement

25/26

POL-063

1. Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) and sets out the steps that GRAHAM has taken (and is continuing to take) to achieve our target of ensuring that modern slavery or human trafficking is not taking place within our business or supply chain.

The Act creates offences in respect of slavery, servitude, forced or compulsory labour, and human trafficking (“Modern Slavery”). It also requires certain businesses to provide disclosure concerning their efforts to address the prevention of slavery and human trafficking in their supply chains. These disclosures are intended to provide clients the ability to make better informed decisions about the services they buy and companies they support.

2. Structure & Supply Chain

GRAHAM is a multi-skilled organization operating in the construction, asset management and project investment sectors, offering services to a diverse range of clients in the UK and Ireland. The group comprises a holding company, John Graham Holdings Limited and three main subsidiary companies; John Graham Construction Limited, GRAHAM Asset Management Limited and GRAHAM Investment Projects Limited.

Our supply chain includes companies who supply raw materials, specialist trade contractors who undertake supply and fix contracts, labour-only subcontractors, and specialist professional organisations that provide a range of services across the portfolio of projects we deliver for our clients.

We believe that working in partnership with our clients, community, stakeholders and supply chain in a sustainable way enables us to find more practical and safer methods of ethical trading free from slavery and human trafficking.

GRAHAM is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations and those of our supply chain.

3. Policies & Procedures

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner, and communicate this through our Code of Conduct. Our policies include (amongst others): -

- POL-058 Anti-Bribery Policy
- POL-110 Anti-Fraud Policy
- POL-111 Anti-Money Laundering Policy
- POL-062 Anti-Slavery and Human Trafficking Policy
- POL-030 Recruitment Policy
- POL-041 Whistleblowing Policy
- POL-005 Commitment to Fair and Prompt Payment Policy
- POL-078 Equality, Diversity and FIR Policy
- POL-010 Supply Chain Policy

4. Due Diligence

GRAHAM operates a preferred supplier database and conducts due diligence on all suppliers before allowing them to become a preferred supplier.

Our Anti-Slavery and Human Trafficking Policy and compliance with the Act, forms part of our contract with all suppliers and subcontractors, and they are required to confirm Right To Work provisions, and that no part of their business operations contradicts our policy or breaches the Act. (Clause 22(c) and Schedules 17 & 18 of our Subcontract Agreement)

We will only trade with those who fully comply with this policy and may terminate the contract at any time should any instances of slavery and human trafficking become apparent.

Suppliers and subcontractors are required to notify GRAHAM as soon as they become aware of any instance of modern slavery or human trafficking taking place in their business or their own supply chain, through their own due diligence or internal whistleblowing processes.

5. Risk Assessment

We reviewed our 2024/25 risk assessment and acknowledged that, with the majority of our work subcontracted to specialists from our preferred supply chain, the most significant risks remain here, and therefore this is where our 2025/26 Modern Slavery audits were focussed. These audits were conducted in August 2025 by our operations-independent SHE department, and were clear during this financial year.

6. Measuring Effectiveness

Our in-house Safety, Health & Environmental Sustainability Team conduct operations-independent regular documented audits of our projects to identify if common markers of Modern Slavery exist, and to safeguard against it taking place within the business or our supply chain. As stated in section 5 above, these audits are conducted annually in August and during this financial year these audits were clear.

Our Internal Audit Team also conduct reviews of our policies and procedures to measure compliance with them and effectiveness of them. During this financial year there were no non-conformances raised in relation to slavery or human trafficking.

7. Training for Staff

GRAHAM regularly provides information, tool-box talks, and awareness training so that staff understand the signs of slavery and human trafficking and know the action to take if they suspect that it could be occurring. We provide links to and utilise the resources at www.stronger2gether.org and <https://www.gov.uk/government/collections/modern-slavery>, and display the stronger2together Multi-language Worker Posters on sites.

8. Sign-Off

This statement constitutes the GRAHAM Slavery and Human Trafficking Statement for the financial year ending 31 March 2026. It has been approved by our Board of Directors, who will review and update it as necessary on an annual basis.

Michael Graham
Chairman
John Graham Holdings Limited