

Modern Slavery &  
Human Trafficking  
Statement  
2021

# Modern Slavery & Human Trafficking Statement 2021

This Statement is made pursuant to section 54 (1) of the UK Modern Slavery Act 2015 and constitutes QG Construction UK Limited Modern Slavery Statement for the financial year ending on **31st December 2021**. This statement sets out the concrete actions taken to assess and mitigate the risk of slavery and human trafficking in our business and supply chain.

This Statement applies to QG Construction UK Limited (hereinafter “**Company**”) and its subsidiaries and branches. As of 31st December 2021, the Company has a Subsidiary in Ivory Coast and a duly established branch in Ghana.

Furthermore, this Statement, applies to all persons working for us or on our behalf in any sector, project, country, including employees at all levels, directors, officers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

At QG Construction UK Limited, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operations and supply chain.



# Our business, values and policies

QG Construction UK Limited is part of the QGMI Group, a construction enterprise specialized in developing, structuring, and implementing infrastructure and construction projects worldwide. The group actively contributes to sustainable development goals, delivering financial, technological, legal, and cultural knowledge to all key stakeholders on the implementation of infrastructure projects and services in emerging countries.

We are committed to create a sustainable business with the objective to have a net positive impact on climate, environment, and people. Our values underpin what we do and help to create a culture of accountability, responsibility, and collaboration on a range of issues, including but not limited to withstand modern slavery. More about what we do, our values and compliance overview can be found at [www.qgmi.uk](http://www.qgmi.uk).

We are driven to collaborate with our stakeholders to combat slavery and human trafficking throughout our operations and those associated with our business. This is not a standalone issue, but one which forms part of our approach to ensure that actions have been taken as due diligence of compliance to: Treat people with fairness, dignity, and respect; Source goods and services responsibly; Promote and strive for transparency; and conduct our business with the highest regard to ethical and environmental standards.

To encourage good practises inside and outside the business, we have established a relationship of trust and integrity with all our suppliers. The processes and procedures of the Compliance Programme while contracting suppliers, includes a wide Third-Party Due Diligence, established according its business risk level and complexity , as well as the request of acceptance of our ethical code of ethics, principles and values. We are committed to ensure that our employee, third parties abide by the highest professional and ethical standards.

Our business ethics policies set out our commitment and minimum requirements, a section on Human Trafficking, slavery and the right to voluntary labour is incorporated within the Company. More about our Code of Ethics and Compliance Policy Book can be found at [www.Company.eu/code-of-ethics-and-compliance-policy-book/](http://www.Company.eu/code-of-ethics-and-compliance-policy-book/).

Our Compliance Programme is a constantly evolving its crime prevention system, always seeking to anticipate trends in the sector, which has enabled it to obtain ISO 37001 (Anti-Bribery System) and ISO 37301 (Compliance Management System).

We and our projects embrace the Company's group-wide Integrated Management System, which is responsible for health and safety management in the supply chain. More about our Integrated Management System can be found at [www.Company.eu/integrated-management-system/](http://www.Company.eu/integrated-management-system/)

So far, we haven't been made aware of any allegations of human trafficking or slavery activities against any of our suppliers, but if we were, then we would act immediately to report to the competent authorities.

## I Our Supply Chain

We have a large and complex supply chain, due to the scope and nature of our work and our geographical spread across Europe and Africa.

### **Subcontractors and Service Providers**

We have a varied supply chain from construction package subcontractors to service and consultancy suppliers, working across different parts of the business spanning a wide range of skill levels. We have a supply chain management system to prospect, register, due diligence and monitor our subcontractors and service providers and dedicated procurement managers across the business to manage relationships.

### **Materials and Goods**

We procure materials and goods to service our business operations, but most materials are sourced through our subcontractor supply chain and are specified to meet the needs of our clients and the projects we deliver for them.

### **Hotspots and Risks**

Working with a third party, we carried out a high-level risk assessment of our spend. This identified the key trades and categories of spend where

there is potential for higher risk of modern slavery or issues which may lead to modern slavery.

Working with a third party, we carried out a high-level risk assessment with a conservative approach according to the key trades and categories of suppliers, locations where there is potential for higher risk of modern slavery or issues which may lead to modern slavery.

We are continuing to learn from the market and regulations to establish a proper risk approach regarding to people and human rights. On this basis, we prefer long term relationships with a referral supplier in the market, whose share same values and goal with our Company. We update our risk assessment over time and report back on findings and actions taken.

## I What we are doing

We encourage all employees to be aware and report any suspected incidents of unfair treatment either within our business or within our supply chain. For this purpose, we have an Ethics Channel available 24/7 in our website and a phone line to receive grievance, complains and reports, that will be treated accordingly our internal policies.

We also have a working group with representatives from our legal, human resources, commercial, supply chain and sustainability teams who continue to collaborate with our company and branches, to identify and carry out the appropriate and proportionate measures that should be taken to minimise the risks of modern slavery or human trafficking in our organisation or in our supply chains.

More about our ethical Channel can be found at <https://www.qgmi.eu/ethical-channel/>

# Risk Assessment, Codes and Policies Book

The Company operates the following codes and policies for identifying and preventing modern slavery and human trafficking in our operations:

Biennial Revision of Risk Matrix.

- Code of Ethics.
- Suppliers and Third Parties Code of Ethics.
- Know Your Supplier Policy.
- Ethical Channel and Disciplinary Measures Policy.
- Third Party Due Diligence Process.
- Modern Slavery Questionnaire.

# Training and Communication

We have identified communication, induction and training on modern slavery and human trafficking as a priority for the Company.

Actions we have undertaken during 2021 included:

- Live and Online Modern Slavery Training Sessions for all personal, starting with Top Management and achieving all strategic level personal.
- Remodelling our Due Diligence Questionnaire to include modern slavery questions and commitments.
- Resources accessed include e-learning, guidance documents on tackling modern slavery and ethical procurement practices, toolkits (e.g., for supply chain mapping).
- Modern slavery e-learning was added to our mandatory training schedule for all employees at the end of 2021.
- Projects displayed our awareness posters and used our toolbox talk.

# Compliance, Validity and Approval

We have a Compliance Officer who is responsible for overseeing compliance with the Modern Slavery Act and responsible for the annual preparation of the Modern Slavery Act Transparency Statement.

This statement covers the period from 1st January 2021 to 31st December 2021 and has been approved unanimously on the 26th May of 2022 by the board of directors of QG Construction UK Limited.



**Gustavo Dantas Guerra**  
Director